

**EXHIBIT A**

Declaration of Richard E. Coe

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

**Vascular Access Centers, L.P.,**

Debtor.

Hon. Ashely M. Chan

Chapter 7

Case No. 19-17117 (AMC)

**DECLARATION OF RICHARD E. COE**

RICHARD E. COE, pursuant to 28 U.S.C. § 1746, being of full age, hereby declares as follows:

1. I am an attorney at law duly admitted to practice before this Court and a partner with the law firm of Faegre Drinker Biddle & Reath LLP, attorneys for William Whitfield Gardner (“**Gardner**”), the majority-in-interest limited partner of the debtor herein, Vascular Access Centers, L.P. (“**VAC**” or “**Debtor**”). I make this Declaration based on personal knowledge and in support of Gardner’s *Supplemental Application for Sanctions Amount* filed contemporaneously herewith (“**Application**”).

2. In responding to the VAC bankruptcy, Gardner relied on counsel from Faegre Drinker Biddle & Reath LLP (“**Faegre Drinker**”), an international, full service law firm with over 1000 attorneys working in 21 offices. Faegre Drinker is one of the 50 largest law firms headquartered in the United States. Faegre Drinker attorneys and paraprofessionals had significant institutional knowledge of VAC, its bankruptcy case, and McGuckin,<sup>1</sup> having represented Gardner for years this matter and others, and the expertise required to perform the complex tasks in this matter.

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<sup>1</sup> Capitalized terms used herein but not defined herein have the meanings as set forth in the Application.

3. I am a Partner in Faegre Drinker's Philadelphia office and the co-leader of the firm's Complex Commercial Disputes Team. I graduated *cum laude* from Harvard Law School in 2003 and clerked for the Hon. Jan E. DuBois of the United States District Court for the Eastern District of Pennsylvania. I routinely handle complex litigation matters within the firm, including antitrust matters, class actions, shareholder derivative suits, and fiduciary duty matters. I have been the lead attorney representing Gardner in multiple actions since February 2017 and, among other things, contributed my knowledge of McGuckin's conduct to the team handling the bankruptcy matters.

4. Joseph N. Argentina, Jr. is Counsel in the Finance and Restructuring Group in Faegre Drinker's Philadelphia and Wilmington offices. Since graduating *cum laude* from Temple Law School (evening program), he has handled complex bankruptcy and collection matters for a variety of clients, including debtors, trustees, committees, creditors, and equity holders. Mr. Argentina has extensive knowledge and experience in bankruptcy, debtor-creditor law, and collection matters. Mr. Argentina has led and provided bankruptcy and collection counsel in virtually all proceedings in this case.

5. Brendan P. McHugh is an Associate in the Commercial Litigation Group in Faegre Drinker's Philadelphia office. Mr. McHugh graduated from Washington and Lee University School of Law, J.D. magna cum laude, Order of the Coif. Mr. McHugh routinely represents individuals and companies in commercial disputes in both state and federal courts across the country, with an emphasis on financial litigation. Mr. McHugh drafted many of the pleadings and other documents required in this matter, attended hearings and conferences, and researched complex legal and factual laws, rules, and protocols in the many courts involved in this matter.

6. The attorneys listed above provided a significant portion of the services in this case. Many other Faegre Drinker lawyers and paralegals also contributed in the matter, but their participation was often limited to smaller tasks, such as discrete research, drafting of a single document, file review, or advice on a narrow or isolated issue. We have not included their biographical information here or a description of the services they provided, but we would be happy to provide it at the Court's request.

7. Attached hereto as **Exhibit 1** are the details of the fees incurred by Gardner as a result of McGuckin and PVI's conduct described in the Court's Sanctions Opinion since March 10, 2022, the date Gardner submitted the last application in support of sanctions, and December 31, 2024, the date through which Gardner has been invoiced. Gardner agreed to pay the rates set forth in the attached Exhibit.

8. Many Faegre Drinker attorneys and paralegals provided services to Gardner in this matter that were not charged in the exercise of my reasonable billing judgment. These entries do not appear on Exhibit 1.

9. The first page of Exhibit 1 begins a chart that lists the fees incurred in connection with the Sanctions Motion, including fees incurred in the Sanctions Appeal, which are highlighted in blue. Fees and expenses incurred by Gardner in connection with McGuckin's appeal of the Trustee Order (one of the Sanctions Categories) begin on page 79 of Exhibit 1. For the Court's convenience, fees and expenses incurred by Gardner in the Sanctions Appeal, which are included in the first part of Exhibit 1 and highlighted in blue, have been listed again beginning on page 84 of Exhibit 1.

10. The firm and Gardner agreed that the actual hourly rates billed by the Faegre Drinker firm to Gardner in this matter, as reflected on Exhibit 1, would be in many cases

substantially discounted from the firm's usual hourly rates. Moreover, the firm and Gardner had previously agreed to an across-the-board discount of 10% from the standard hourly rates normally billed by the lawyers who billed time for this matter, which is reflected at the bottom of each category of fees. The actual rates shown on Exhibit 1 and claimed in the Application are therefore well below the normal range of hourly billing rates billed by Faegre Drinker.

11. Judges in the United States District Court for the Eastern District of Pennsylvania have repeatedly found that Faegre Drinker's rates are reasonable in comparison to other firms in the Philadelphia market. *See* Order, *O'Shaughnessy v. Palazzo*, No. 19-5115, Dkt. Nos. 100 and 101 (May 21, 2021) (approving fee application); *Urban Outfitters, Inc. v. BCBG Max Azria Group, Inc.*, No. 06-4003, 2010 WL 2431463 (E.D. Pa. June 11, 2010) (Baylson, J.) (awarding full fee request); *see also, e.g., De Lage Landen Fin. Servs., Inc. v. Miramax Film Corp.*, No. 06-2319, 2009 WL 678625, at \*8 (E.D. Pa. Mar. 16, 2009) (McLaughlin, J.) ("The [Drinker Biddle] lawyers for Miramax were skilled, experienced, and efficient in their work, and their rates were in accord with prevailing market rates for the services they performed."); *Berg Chilling Sys., Inc. v. Hull Corp.*, No. 00-5075, 2005 WL 67081, at \*3 (E.D. Pa. Jan. 11, 2005) (Schiller, J.) ("The Court . . . finds the hourly rates charged by Drinker Biddle reasonable and will not reduce them.").

12. The Exhibit and the information contained therein were prepared by Faegre Drinker personnel at my direction.

13. Attached hereto as Exhibit 2 is a copy of the transcript of the February 8, 2023 hearing before this Court on the Stay Motion.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on April 17, 2025

/s/ Richard E. Coe  
Richard E. Coe

## **Exhibit 1**

Fee Details

## Gardner Time Entries in Support of Sanctions Application

Incurred in connection with Gardner's Motion for Sanctions

Fees						
Timekeeper Name	Title	Work Date	Hours	Bill Rate	Billed Amount	Narrative
Argentina, Joseph	Counsel	01/03/22	2.8	\$650.00	\$1,820.00	Review and analyze McGuckin objection to sanctions and declaration in support (2.4); e-mail correspondence with R. Coe and B. Morgan re: same (0.4).
Morgan, Brian P.	Partner	01/04/22	1.5	\$765.00	\$1,147.50	Review objection to sanctions application, expert declaration and supporting exhibits (0.8); conference call with J. Argentina and R. Coe to discuss response to objection and strategy for evidentiary hearing (0.7)
Argentina, Joseph	Counsel	01/04/22	2.1	\$650.00	\$1,365.00	Confer with R. Coe and B. Morgan re: response to sanctions objection (0.8); legal research regarding UST guidelines and fee applications (1.3).
Coe, Richard E.	Partner	01/04/22	2.9	\$785.00	\$2,276.50	Review McGuckin response to fee petition and exhibits and send email to J. Argentina summarizing points for reply (1.3); conference with J. Argentina and B. Morgan re: reply (0.7); conference with I. Thresher re: Daubert motion (0.7); send emails to I. Thresher re: arguments for Daubert reply and background (0.2).
Thresher, Ian C.	Associate	01/04/22	3.8	\$580.00	\$2,204.00	Call with R. Coe discussing matter and upcoming projects (0.7); review prior court orders related to sanctions and defendant's January 3, 2022 reply to Application for Sanctions
Argentina, Joseph	Counsel	01/05/22	3.5	\$650.00	\$2,275.00	Confer with I. Thresher re: Daubert motion (0.7); research and drafting for reply brief on sanctions application (2.8).
Thresher, Ian C.	Associate	01/05/22	5.6	\$580.00	\$3,248.00	Call with J. Argentina to discuss matter and need for a Daubert motion against defendant's expert (0.7); call with R. Coe discussing strategy and relevant case law for Daubert motion (0.2); research into applicable case law (4.7).
Coe, Richard E.	Partner	01/05/22	0.8	\$785.00	\$628.00	Review prior briefing and research on Daubert issues and send emails to I. Thresher re: same (0.5 hours); conference with I. Thresher re: Daubert motion (0.3 hours).
Argentina, Joseph	Counsel	01/06/22	3.6	\$650.00	\$2,340.00	Continue research and drafting for reply brief on sanctions application.
Thresher, Ian C.	Associate	01/06/22	6.5	\$580.00	\$3,770.00	Research into applicable case law involving the reliability and relevance prongs of Daubert and outline Cohen Daubert motion in preparation for draft.
Argentina, Joseph	Counsel	01/07/22	0.8	\$650.00	\$520.00	Continue draft of reply brief on sanctions petition
Thresher, Ian C.	Associate	01/07/22	6.4	\$580.00	\$3,712.00	Draft the Cohen Daubert motion and research applicable case law related to same.
Darch, Kyle E.	Associate	01/10/22	0.5	\$485.00	\$242.50	Research regarding sanctions case law.
Argentina, Joseph	Counsel	01/10/22	0.3	\$650.00	\$195.00	Assign research project to K. Darch re: sanctions reply brief.
Argentina, Joseph	Counsel	01/10/22	4.5	\$650.00	\$2,925.00	Continue research and drafting for reply brief on sanctions application.
Argentina, Joseph	Counsel	01/10/22	1.1	\$650.00	\$715.00	Review and revise Daubert motion regarding McGuckin expert.
Thresher, Ian C.	Associate	01/10/22	4.7	\$580.00	\$2,726.00	Complete draft of J. Cohen Daubert motion and submit to R. Coe and J. Argentina for
Darch, Kyle E.	Associate	01/11/22	1.4	\$485.00	\$679.00	Research cases for sanctions brief.
Argentina, Joseph	Counsel	01/11/22	4.1	\$650.00	\$2,665.00	Continue research and drafting for sanctions application reply brief.
Thresher, Ian C.	Associate	01/11/22	8.3	\$580.00	\$4,814.00	Call with J. Argentina to discuss edits to the Daubert motion (0.7); incorporate edits and research additional case law regarding expert qualifications and whether expert opinion is warranted (7.6).
Argentina, Joseph	Counsel	01/11/22	0.7	\$650.00	\$455.00	Confer with I. Thresher re: Daubert motion.
Argentina, Joseph	Counsel	01/11/22	0.2	\$650.00	\$130.00	Gather cases on blanket fees and send to I. Thresher.



Darch, Kyle E.	Associate	01/11/22	0.7	\$485.00	\$339.50	Call with J. Argentina regarding sanctions reply brief.
Thresher, Ian C.	Associate	01/12/22	4.6	\$580.00	\$2,668.00	Review and incorporate additional edits from J. Argentina on the Cohen Daubert motion.
Argentina, Joseph	Counsel	01/12/22	1.8	\$650.00	\$1,170.00	Review and revise latest draft of Daubert motion to exclude Cohen.
Darch, Kyle E.	Associate	01/12/22	3.0	\$485.00	\$1,455.00	Research regarding sanctions under a court's inherent authority (2.7); email to J. Argentina regarding same (0.3).
Argentina, Joseph	Counsel	01/12/22	8.7	\$650.00	\$5,655.00	Research and drafting for reply brief on sanctions application.
Argentina, Joseph	Counsel	01/13/22	2.1	\$650.00	\$1,365.00	Finish draft of reply brief on sanctions application.
Darch, Kyle E.	Associate	01/13/22	0.1	\$485.00	\$48.50	Communications with J. Argentina regarding case.
Argentina, Joseph	Counsel	01/13/22	0.3	\$650.00	\$195.00	Assign legal research project to M. Scott re: need for expert to evaluate sanctions.
Argentina, Joseph	Counsel	01/13/22	2.2	\$650.00	\$1,430.00	Review and revise draft of Daubert motion re: Cohen.
Scott, Mary A.	Associate	01/13/22	1.2	\$590.00	\$708.00	Legal research regarding necessity of expert testimony to evaluate reasonableness of attorneys' fees in the context of an award of sanctions.
Scott, Mary A.	Associate	01/14/22	0.2	\$590.00	\$118.00	Prepare written summary of legal research regarding necessity of expert testimony to evaluate reasonableness of attorneys' fees in the context of an award of sanctions.
Scott, Mary A.	Associate	01/14/22	0.5	\$590.00	\$295.00	Continued legal research regarding necessity of expert testimony to evaluate reasonableness of attorneys' fees in the context of an award of sanctions.
Coe, Richard E.	Partner	01/14/22	1.8	\$785.00	\$1,413.00	Review and revise reply in support of sanctions fee petition (1.5); conference with J. Argentina re: same (0.3).
Argentina, Joseph	Counsel	01/14/22	0.4	\$650.00	\$260.00	Revise Daubert motion re: Cohen.
Argentina, Joseph	Counsel	01/14/22	0.2	\$650.00	\$130.00	Confer with R. Coe re: reply brief on sanctions
Argentina, Joseph	Counsel	01/14/22	1.6	\$650.00	\$1,040.00	Revisions to reply brief on sanctions.
Argentina, Joseph	Counsel	01/16/22	1.8	\$650.00	\$1,170.00	Revise reply brief in support of sanctions award.
Argentina, Joseph	Counsel	01/17/22	0.2	\$650.00	\$130.00	File reply brief on sanctions application and related email with W. Gardner.
Argentina, Joseph	Counsel	01/17/22	0.8	\$650.00	\$520.00	Review proposed edits to reply brief from W. Gardner and confer with him re: same.
Argentina, Joseph	Counsel	01/17/22	2.2	\$650.00	\$1,430.00	Finalize reply brief on sanctions application.
Morgan, Brian P.	Partner	01/17/22	2.2	\$765.00	\$1,683.00	Review and revise reply brief in further support of application for attorneys' fees.
Argentina, Joseph	Counsel	01/18/22	7.2	\$650.00	\$4,680.00	Legal research and drafting for Daubert motion to exclude Cohen.
Argentina, Joseph	Counsel	01/19/22	2.4	\$650.00	\$1,560.00	Review and revise motion for expedited consideration (1.1); finalize first draft of Daubert motion (1.3).
Thresher, Ian C.	Associate	01/19/22	5.0	\$580.00	\$2,900.00	Draft motion for expedited consideration of Daubert motion and summarize same for J. Argentina (4.5); review edits from R. Coe to Daubert motion (0.5).
Coe, Richard E.	Partner	01/19/22	1.4	\$785.00	\$1,099.00	Review and revise Daubert brief.
Thresher, Ian C.	Associate	01/20/22	3.5	\$580.00	\$2,030.00	Review edits to Cohen Daubert motion from R. Coe and J. Argentina and implement those into clean version (3.0); draft a proposed order for Daubert motion and send to J. Argentina for his review (0.5).
Argentina, Joseph	Counsel	01/20/22	0.9	\$650.00	\$585.00	Review and revise latest draft of motion to exclude Cohen and LDI.
Argentina, Joseph	Counsel	01/20/22	0.4	\$650.00	\$260.00	E-mail correspondence with counsel to McGuckin, US Trustee, and Chapter 11 Trustee re: motion to expedite motion to exclude.
Argentina, Joseph	Counsel	01/20/22	0.8	\$650.00	\$520.00	Finish draft of motion to expedite motion to exclude and draft proposed order.
Argentina, Joseph	Counsel	01/20/22	0.2	\$650.00	\$130.00	Review draft proposed order on motion to exclude.
Argentina, Joseph	Counsel	01/20/22	0.2	\$650.00	\$130.00	Confer with R. Coe re: motion to exclude, motion to expedite.
Morgan, Brian P.	Partner	01/21/22	0.4	\$765.00	\$306.00	Communicate with R. Coe and I. Thresher regarding cross examination of Cohen.
Oliver, Beth A.	Paralegal	01/21/22	0.8	\$385.00	\$308.00	Research various chapter 11 bankruptcies where Lowenstein Sandler filed fee applications, if there was a fee auditor, download fee apps, and fee auditor reports, and Confer with R. Coe re: hearing scheduling and evidence issues.
Argentina, Joseph	Counsel	01/21/22	0.5	\$650.00	\$325.00	
Argentina, Joseph	Counsel	01/21/22	0.3	\$650.00	\$195.00	E-mail correspondence with counsel to McGuckin, UST, and C. Hemrick regarding Daubert motion and related motion to expedite.

Argentina, Joseph	Counsel	01/21/22	1.8	\$650.00	\$1,170.00	Finalize and file Motion to Exclude Cohen and LDI and related Motion to Expedite hearing on same.
Argentina, Joseph	Counsel	01/21/22	0.3	\$650.00	\$195.00	Confer with V. Slusher and M. Pompeo regarding experience with McGuckin expert.
Argentina, Joseph	Counsel	01/21/22	0.3	\$650.00	\$195.00	Draft proposed order on motion to expedite.
Argentina, Joseph	Counsel	01/21/22	0.5	\$650.00	\$325.00	Research on McGuckin expert.
Argentina, Joseph	Counsel	01/21/22	0.3	\$650.00	\$195.00	Confer with R. Coe re: motion to exclude Cohen and related matters.
Coe, Richard E.	Partner	01/21/22	0.9	\$785.00	\$706.50	Exchange emails re: Cohen cross-examination (0.2); conference with J. Argentina re: same (0.2); conference with J. Argentina re: potential fee expert and other issues related to hearing on fee petition (0.5).
Thresher, Ian C.	Associate	01/21/22	1.1	\$580.00	\$638.00	Discussion with B. Morgan regarding upcoming cross examination of J. Cohen; prepare outline for same; start review of fee application materials from Lowenstein Sandler LLP.
Morgan, Brian P.	Partner	01/24/22	2.5	\$765.00	\$1,912.50	Review McGuckin's objection to sanctions, Gardner's reply and motion to exclude and identify areas for cross examination of McGuckin's expert.
Thresher, Ian C.	Associate	01/24/22	7.2	\$580.00	\$4,176.00	Review fee applications that Lowenstein Sandler LLP had submitted in other cases and note issues with the billable time for inclusion in upcoming J. Cohen cross and draft outline of J. Cohen cross to discuss at team meeting.
Argentina, Joseph	Counsel	01/24/22	0.9	\$650.00	\$585.00	E-mail correspondence with court and counsel to McGuckin re: motion to exclude schedule (0.3); draft scheduling order (0.6).
Morgan, Brian P.	Partner	01/25/22	0.7	\$765.00	\$535.50	Participate in call with R. Coe and I. Thresher regarding strategy for sanctions hearing and deposition of McGuckin's expert.
Argentina, Joseph	Counsel	01/25/22	0.4	\$650.00	\$260.00	Conference with R. Coe and B. Morgan re: Daubert hearing.
Coe, Richard E.	Partner	01/25/22	0.7	\$785.00	\$549.50	Conference with B. Morgan and I. Thresher re: Daubert hearing and Cohen cross-
Thresher, Ian C.	Associate	01/25/22	2.1	\$580.00	\$1,218.00	Prepare for and attend meeting with R. Coe and B. Morgan regarding J. Cohen cross examination and upcoming hearings (0.7); organize notes following meeting for inclusion in J. Cohen cross outline (1.4).
Thresher, Ian C.	Associate	01/26/22	0.8	\$580.00	\$464.00	Begin draft of J. Cohen cross examination outline for B. Morgan review.
Morgan, Brian P.	Partner	01/27/22	1.3	\$765.00	\$994.50	Review and revise outline for cross examination of McGuckin's expert on fees.
Thresher, Ian C.	Associate	01/27/22	2.5	\$580.00	\$1,450.00	Draft and submit J. Cohen cross examination outline for B. Morgan review.
Morgan, Brian P.	Partner	01/28/22	2.7	\$765.00	\$2,065.50	Review Cohen's declaration and exhibits thereto (1.0); revise outline for cross examination of Cohen (1.7).
Thresher, Ian C.	Associate	01/31/22	3.7	\$580.00	\$2,146.00	Review edits to J. Cohen cross examination outline from B. Morgan and revise same.
Morgan, Brian P.	Partner	01/31/22	0.4	\$765.00	\$306.00	Identify exhibits for Cohen's cross-examination.
Argentina, Joseph	Counsel	02/01/22	0.4	\$650.00	\$260.00	Initial review of McGuckin objection to Daubert motion and assign analysis to I. Thresher.
Thresher, Ian C.	Associate	02/01/22	1.1	\$580.00	\$638.00	Review McGuckin's response to Daubert motion and make notes (1.1).
Argentina, Joseph	Counsel	02/02/22	6.1	\$650.00	\$3,965.00	Confer with I. Thresher and B. Morgan on Daubert hearing (0.8); further review of McGuckin Daubert response (0.8); review cases in McGuckin response to Daubert motion (3.3); begin draft of hearing argument (1.2).
Coe, Richard E.	Partner	02/02/22	1.3	\$785.00	\$1,020.50	Conference with J. Argentina re: Daubert motion (0.1); review Daubert motion and cases cited in Daubert motion and send emails to J. Argentina re: potential arguments (1.2).
Thresher, Ian C.	Associate	02/02/22	4.7	\$580.00	\$2,726.00	Review case law cited in defendant's opposition to Daubert motion and work with J. Argentina to prepare for hearing regarding same.
Morgan, Brian P.	Partner	02/02/22	1.0	\$765.00	\$765.00	Research whether expert is required on application for fees (.7); correspondence with R. Coe and J. Argentina regarding experts and fee applications (.3).
Morgan, Brian P.	Partner	02/03/22	0.3	\$765.00	\$229.50	Attend hearing on motion to quash expert report and testimony.

Argentina, Joseph	Counsel	02/03/22	3.0	\$650.00	\$1,950.00	Prepare for hearing on Daubert motion (review pleadings, key cases, revise draft argument outline) (1.8); attend hearing (0.4); post-hearing conference with R. Coe and B. Morgan re: outcomes and preparation for hearing on February 10 (0.8).
Coe, Richard E.	Partner	02/03/22	1.9	\$785.00	\$1,491.50	Review and revise Cohen cross-examination outline (0.8); prepare for and attend hearing on Daubert motion (0.3); conference with B. Morgan and J. Argentina re: hearing on fee petition (0.8).
Thresher, Ian C.	Associate	02/04/22	1.1	\$580.00	\$638.00	Review McGuckin bankruptcy filings to determine best arguments he would have to reduce the sanctions amount (0.7); summarize topics and send to R. Coe for review (0.4).
Argentina, Joseph	Counsel	02/07/22	0.2	\$650.00	\$130.00	Confer with B. Morgan re: motion to quash and sanctions hearing.
Coe, Richard E.	Partner	02/07/22	2.0	\$785.00	\$1,570.00	Review briefing and declaration in preparation for hearing on fee petition.
Coe, Richard E.	Partner	02/08/22	0.7	\$785.00	\$549.50	Conference with J. Argentina re: sanctions hearing.
Coe, Richard E.	Partner	02/08/22	1.8	\$785.00	\$1,413.00	Prepare for hearing on sanctions fee application.
Morgan, Brian P.	Partner	02/09/22	0.2	\$765.00	\$153.00	Conference calls with J. Argentina and R. Coe regarding sanctions application.
Argentina, Joseph	Counsel	02/09/22	2.8	\$650.00	\$1,820.00	Draft argument outline and redirect outline for sanctions hearing.
Coe, Richard E.	Partner	02/09/22	0.6	\$785.00	\$471.00	Prepare for hearing on sanctions fee petition.
Morgan, Brian P.	Partner	02/10/22	1.3	\$765.00	\$994.50	Review and revise outline for evidentiary hearing on sanctions application (0.8); attend evidentiary hearing on sanctions application (0.2); conference call with J. Argentina and R. Coe following evidentiary hearing concerning revised sanctions submission (0.3).
Argentina, Joseph	Counsel	02/10/22	0.3	\$650.00	\$195.00	Attend hearing on sanctions.
Argentina, Joseph	Counsel	02/10/22	1.3	\$650.00	\$845.00	Prepare for hearing on sanctions.
Argentina, Joseph	Counsel	02/10/22	1.2	\$650.00	\$780.00	Telephone conferences with R. Coe, B. Morgan, and W. Gardner re: hearing on sanctions and next steps.
Argentina, Joseph	Counsel	02/10/22	0.8	\$650.00	\$520.00	Review invoice analyses and begin processing of most recent invoices for sanctions
Coe, Richard E.	Partner	02/10/22	2.1	\$785.00	\$1,648.50	Review and revise outline for oral argument on fee petition (0.9); review B. Morgan edits to same (0.1); prepare for and attend oral argument on fee petition (0.4); conference with J. Argentina and B. Morgan re: same and submission of revised fee petition (0.7).
Coe, Richard E.	Partner	02/17/22	0.3	\$785.00	\$235.50	Conference with J. Argentina re: supplemental fee petition.
Coe, Richard E.	Partner	02/21/22	3.0	\$785.00	\$2,355.00	Review and revise invoices for supplemental fee petition.
Coe, Richard E.	Partner	02/22/22	2.8	\$785.00	\$2,198.00	Review and revise invoices for amended sanctions fee petition.
Coe, Richard E.	Partner	02/23/22	3.1	\$785.00	\$2,433.50	Review and revise invoices in preparation for submitting amended fee petition.
Morgan, Brian P.	Partner	02/24/22	0.3	\$765.00	\$229.50	In connection with sanctions application, review breakdown of tasks by categories requested by the Court.
Argentina, Joseph	Counsel	02/24/22	0.2	\$650.00	\$130.00	Review docket and manage critical dates calendar.
Argentina, Joseph	Counsel	02/24/22	0.2	\$650.00	\$130.00	Confer with R. Coe re: sanctions invoice project.
Coe, Richard E.	Partner	02/24/22	3.1	\$785.00	\$2,433.50	Review and revise invoices for amended fee petition (2.9); conference with J. Argentina re: same (0.2).
Coe, Richard E.	Partner	02/28/22	0.3	\$785.00	\$235.50	Exchange emails with J. Argentina re: invoices for fee petition and entries on invoices.
Coe, Richard E.	Partner	02/28/22	0.4	\$785.00	\$314.00	Conference with J. Argentina re: strategy for amended fee petition.
Slusher, Vince P.	Partner	02/28/22	0.4	\$1,190.00	\$476.00	Review sanctions order.
Argentina, Joseph	Counsel	02/28/22	3.8	\$650.00	\$2,470.00	Review and revise invoice spreadsheet in support of amended sanctions application.
Argentina, Joseph	Counsel	03/01/22	4.8	\$650.00	\$3,120.00	Review and comment on time entry categorizations for sanctions application and related email to R. Coe.
Argentina, Joseph	Counsel	03/02/22	1.8	\$650.00	\$1,170.00	Begin draft of supplemental application for sanctions amount.
Argentina, Joseph	Counsel	03/02/22	0.5	\$650.00	\$325.00	Telephone conference with R. Coe re: sanctions application invoices.
Coe, Richard E.	Partner	03/02/22	0.5	\$785.00	\$392.50	Conference with J. Argentina re: comments and edits to invoices.
Coe, Richard E.	Partner	03/02/22	1.1	\$785.00	\$863.50	Review J. Argentina comments and edits to invoices.
Argentina, Joseph	Counsel	03/03/22	4.8	\$650.00	\$3,120.00	Analyze invoices for sanctions application and prepare exhibits.

Argentina, Joseph	Counsel	03/04/22	4.9	\$650.00	\$3,185.00	Prepare exhibits for supplemental application in support of sanctions.
Argentina, Joseph	Counsel	03/04/22	1.8	\$650.00	\$1,170.00	Begin draft of supplemental application in support of sanctions.
Coe, Richard E.	Partner	03/07/22	3.0	\$785.00	\$2,355.00	Review and revise affidavit, application and exhibits to supplemental fee application.
Taticchi, Mark D.	Partner	03/07/22	0.5	\$715.00	\$357.50	Correspond with R. Coe, J. Argentina re: preservation issues in connection with sanctions application.
Argentina, Joseph	Counsel	03/07/22	3.8	\$650.00	\$2,470.00	Complete draft of supplemental application for sanctions award, Coe declaration, exhibits, revised proposed order.
Morgan, Brian P.	Partner	03/08/22	2.6	\$765.00	\$1,989.00	In support of application for sanctions, review time entries and identify those encompassed by Court's 2/10/22 order.
Taticchi, Mark D.	Partner	03/08/22	0.5	\$715.00	\$357.50	Analyze revised sanctions fee application and supporting affidavit.
Argentina, Joseph	Counsel	03/08/22	0.8	\$650.00	\$520.00	Revise supplemental application for sanctions amount, Coe declaration, and related invoice exhibits (.7); email correspondence with M. Taticchi re: application and declaration verbiage (.1).
Coe, Richard E.	Partner	03/08/22	1.3	\$785.00	\$1,020.50	Review and revise invoices for supplemental fee application and exchange emails re: edits.
Coe, Richard E.	Partner	03/08/22	0.5	\$785.00	\$392.50	Conference with J. Argentina re: fee petition.
Coe, Richard E.	Partner	03/09/22	1.3	\$785.00	\$1,020.50	Review and revise supplemental fee petition.
Argentina, Joseph	Counsel	03/10/22	2.2	\$650.00	\$1,430.00	Finalize and coordinate filing of Supplemental Application for sanctions.
Oliver, Beth A.	Paralegal	03/10/22	0.7	\$385.00	\$269.50	Finalize for filing supplemental application for sanctions.
Coe, Richard E.	Partner	03/10/22	1.1	\$785.00	\$863.50	Review and revise supplemental fee petition papers.
Coe, Richard E.	Partner	03/10/22	0.2	\$785.00	\$157.00	Conference with client re: fee petition.
Argentina, Joseph	Counsel	03/31/22	0.3	\$650.00	\$195.00	Initial review of McGuckin reply to sanctions.
Argentina, Joseph	Counsel	04/04/22	2.3	\$650.00	\$1,495.00	Review McGuckin objection to supplemental sanctions application and begin draft
Argentina, Joseph	Counsel	04/05/22	2.6	\$650.00	\$1,690.00	Continue draft of sanctions supplemental reply.
Argentina, Joseph	Counsel	04/06/22	2.2	\$650.00	\$1,430.00	Continue draft of supplemental reply brief on sanctions.
Argentina, Joseph	Counsel	04/08/22	1.8	\$650.00	\$1,170.00	Continue draft of supplemental sanctions reply.
Argentina, Joseph	Counsel	04/10/22	0.1	\$650.00	\$65.00	E-mail correspondence with W. Gardner re: sanctions.
Earle, Katharina	Associate	04/11/22	0.6	\$680.00	\$408.00	Review supplemental application for sanctions and objection thereto; email J. Argentina re: same.
Argentina, Joseph	Counsel	04/11/22	4.7	\$650.00	\$3,055.00	Continue draft of supplemental sanctions reply.
Argentina, Joseph	Counsel	04/12/22	6.4	\$650.00	\$4,160.00	Confer with K. Earle re: multiple legal research projects for sanctions supplemental reply brief (.9); finish first draft of supplemental reply pending research results (5.5).
Earle, Katharina	Associate	04/12/22	3.5	\$680.00	\$2,380.00	Call with J. Argentina regarding reply in connection with supplemental application for sanctions; conduct legal research re: same; review draft reply and email J. Argentina re: same.
Coe, Richard E.	Partner	04/12/22	0.5	\$785.00	\$392.50	Review opposition to motion for sanctions and send email to J. Argentina re: same.
Coe, Richard E.	Partner	04/12/22	0.2	\$785.00	\$157.00	Send email to J. Argentina re: waiver research for motion for sanctions reply.
Earle, Katharina	Associate	04/13/22	2.5	\$680.00	\$1,700.00	Conduct legal research for various arguments advanced in Gardner's reply in support of sanctions award.
Earle, Katharina	Associate	04/14/22	1.0	\$680.00	\$680.00	Conduct legal research in connection with supplemental application for sanctions award.
Earle, Katharina	Associate	04/15/22	5.9	\$680.00	\$4,012.00	Research regarding various legal issues in connection with supplemental application for sanctions; call with J. Argentina re: same.
Argentina, Joseph	Counsel	04/15/22	0.5	\$650.00	\$325.00	Telephone conference with K. Earle re: results of legal research and revisions to draft of sanctions supplemental reply.
Earle, Katharina	Associate	04/16/22	2.5	\$680.00	\$1,700.00	Review case law in connection with reply to McGuckin's objection to sanctions award; revise draft reply accordingly.
Earle, Katharina	Associate	04/18/22	6.5	\$680.00	\$4,420.00	Finalize legal research and revise draft reply accordingly; email R. Coe and J. Argentina re: same.
Earle, Katharina	Associate	04/19/22	0.9	\$680.00	\$612.00	Continue research in connection with draft reply; email J. Argentina re: same.
Argentina, Joseph	Counsel	04/20/22	5.1	\$650.00	\$3,315.00	Research and drafting for sanctions supplemental reply brief.

Argentina, Joseph	Counsel	04/20/22	0.4	\$650.00	\$260.00	Review follow-up research on sanctions amounts from K. Earle.
Earle, Katharina	Associate	04/20/22	0.9	\$680.00	\$612.00	Review case law and discuss draft reply with J. Argentina.
Coe, Richard E.	Partner	04/20/22	2.4	\$785.00	\$1,884.00	Review and revise reply in support of motion for sanctions.
Earle, Katharina	Associate	04/21/22	1.2	\$680.00	\$816.00	Final review and cite check of draft reply; email J. Argentina regarding revisions.
Olivere, Beth A.	Paralegal	04/21/22	0.2	\$385.00	\$77.00	Edit draft reply in further support to sanctions motion in anticipation of filing.
Olivere, Beth A.	Paralegal	04/21/22	0.4	\$385.00	\$154.00	Finalize for filing Reply in Further Support of Supplemental Application for Sanctions
Argentina, Joseph	Counsel	04/21/22	0.2	\$650.00	\$130.00	Coordinate filing of sanctions supplemental reply.
Argentina, Joseph	Counsel	04/21/22	2.5	\$650.00	\$1,625.00	Final revisions to sanctions supplemental reply brief.
Argentina, Joseph	Counsel	04/26/22	0.3	\$650.00	\$195.00	Telephone conference with R. Coe re: sanctions.
Morgan, Brian P.	Partner	05/02/22	0.3	\$765.00	\$229.50	Telephone conference with J. Argentina regarding strategy for hearing on sanctions
Argentina, Joseph	Counsel	05/02/22	0.8	\$650.00	\$520.00	Telephone conferences with R. Coe re: sanctions hearing.
Argentina, Joseph	Counsel	05/02/22	0.8	\$650.00	\$520.00	Prepare for sanctions hearing: prepare trial exhibits.
Argentina, Joseph	Counsel	05/02/22	2.2	\$650.00	\$1,430.00	Prepare for sanctions hearing: draft proffer of R. Coe.
Argentina, Joseph	Counsel	05/02/22	0.5	\$650.00	\$325.00	Prepare for sanctions hearing: work with B. Olivere on hearing preparation binders.
Argentina, Joseph	Counsel	05/02/22	0.3	\$650.00	\$195.00	Prepare for sanctions hearing: email correspondence with all parties re: witness and exhibits for hearing.
Argentina, Joseph	Counsel	05/02/22	1.4	\$650.00	\$910.00	Prepare for sanctions hearing: review pleadings.
Argentina, Joseph	Counsel	05/02/22	0.5	\$650.00	\$325.00	Prepare for sanctions hearing: review court rules and Judge Chan procedures on evidentiary hearings.
Olivere, Beth A.	Paralegal	05/02/22	1.1	\$385.00	\$423.50	Assist in preparation of hearing materials for May 5, 2022 hearing on sanctions.
Coe, Richard E.	Partner	05/02/22	0.5	\$785.00	\$392.50	Prepare for hearing on sanctions award.
Coe, Richard E.	Partner	05/02/22	0.1	\$785.00	\$78.50	Conference with client re: hearing on sanctions award.
Morgan, Brian P.	Partner	05/03/22	0.4	\$765.00	\$306.00	Review and revise proffer of R. Coe.
Argentina, Joseph	Counsel	05/03/22	0.6	\$650.00	\$390.00	Finish draft of Coe proffer in support of sanctions and related email to R. Coe and B.
Argentina, Joseph	Counsel	05/03/22	7.2	\$650.00	\$4,680.00	Detailed review and breakdown of all fees into DIP category and calculation of DIP fee amount as requested by Trustee.
Argentina, Joseph	Counsel	05/03/22	0.3	\$650.00	\$195.00	Review edits to Coe proffer in support of sanctions.
Coe, Richard E.	Partner	05/03/22	3.5	\$785.00	\$2,747.50	Prepare for sanctions hearing and revise profer in preparation for hearing.
Coe, Richard E.	Partner	05/04/22	7.0	\$785.00	\$5,495.00	Prepare for sanctions hearing by reviewing pleadings, expert reports and outline potential responses to cross-examination on fee amounts.
Coe, Richard E.	Partner	05/04/22	0.5	\$785.00	\$392.50	Conference with J. Argentina re: sanctions hearing.
Argentina, Joseph	Counsel	05/04/22	6.6	\$650.00	\$4,290.00	Sanctions: review pleadings and draft argument outlines.
Argentina, Joseph	Counsel	05/04/22	1.1	\$650.00	\$715.00	Sanctions: multiple revisions to Coe proffer.
Argentina, Joseph	Counsel	05/04/22	0.5	\$650.00	\$325.00	Sanctions: confer with R. Coe regarding hearing.
Argentina, Joseph	Counsel	05/05/22	1.4	\$650.00	\$910.00	Telephone conferences with R. Coe and W. Gardner following evidentiary hearing on
Argentina, Joseph	Counsel	05/05/22	2.2	\$650.00	\$1,430.00	Prepare for sanctions hearing: revise argument points and Coe proffer.
Argentina, Joseph	Counsel	05/05/22	0.7	\$650.00	\$455.00	Prepare for sanctions hearing: research federal rules of evidence in anticipation of objection to exhibits.
Argentina, Joseph	Counsel	05/05/22	0.7	\$650.00	\$455.00	Attend evidentiary hearing on sanctions.
Coe, Richard E.	Partner	05/05/22	0.9	\$785.00	\$706.50	Prepare for sanctions hearing.
Coe, Richard E.	Partner	05/05/22	0.7	\$785.00	\$549.50	Attend sanctions hearing.
Argentina, Joseph	Counsel	12/01/22	1.6	\$650.00	\$1,040.00	Initial review of opinion and order awarding sanctions and related email correspondence with W. Gardner
Coe, Richard E.	Partner	12/01/22	1.0	\$785.00	\$785.00	Review sanctions opinion and send emails to J. Argentina re: same.
Argentina, Joseph	Counsel	12/02/22	3.1	\$650.00	\$2,015.00	Legal research and analysis of collection issues on sanctions order and judgment.
Argentina, Joseph	Counsel	12/02/22	0.6	\$650.00	\$390.00	Confer with W. Gardner regarding orders and opinions on sanctions and reconsideration.

Argentina, Joseph	Counsel	12/05/22	3.5	\$650.00	\$2,275.00	Additional review of opinion awarding sanctions (2.2); confer with W. Gardner re: collateral tender terms (.9); review email from counsel to Trustee re: collateral tender
Argentina, Joseph	Counsel	12/12/22	0.3	\$650.00	\$195.00	Review notices of appeal for sanctions and order denying reconsideration.
Argentina, Joseph	Counsel	12/15/22	7.8	\$650.00	\$5,070.00	Attention to sanctions matter: review McGuckin motion to approve letter of credit, research Pennsylvania collection rules and practices, legal research on standards for bond pending appeal, analysis of letter of credit vs bond as security on appeal and strategic issues on substantive response.
Argentina, Joseph	Counsel	12/16/22	0.5	\$650.00	\$325.00	Telephone conference with W. Gardner re: stay motion (.3); related emails (.2).
Argentina, Joseph	Counsel	12/16/22	1.1	\$650.00	\$715.00	Phone conference with R. Imani regarding case background and legal research project for objection to stay motion (.8); related emails (.3).
Argentina, Joseph	Counsel	12/16/22	5.4	\$650.00	\$3,510.00	Legal research and analysis for objection to stay motion.
Coe, Richard E.	Partner	12/16/22	0.3	\$785.00	\$235.50	Review stay motion and conference with J. Argentina re: same.
Imani, Roya	Associate	12/16/22	0.5	\$605.00	\$302.50	Confer and emails with J. Argentina regarding legal research.
Coe, Richard E.	Partner	12/18/22	0.2	\$785.00	\$157.00	Review McGuckin motion to stay and supporting papers.
Argentina, Joseph	Counsel	12/19/22	3.3	\$650.00	\$2,145.00	Continue draft of objection to McGuckin motion for stay.
Argentina, Joseph	Counsel	12/19/22	0.2	\$650.00	\$130.00	Initial review of research results on standard of review by appellate court for sanctions.
Imani, Roya	Associate	12/19/22	4.7	\$605.00	\$2,843.50	Conduct legal research regarding imposition of sanctions; email to J. Argentina.
Imani, Roya	Associate	12/20/22	4.0	\$605.00	\$2,420.00	Conduct legal research regarding letter of credit as acceptable security to protect an appellee during an appeal; emails with J. Argentina re: same.
Argentina, Joseph	Counsel	12/26/22	3.7	\$650.00	\$2,405.00	Legal research and drafting for objection to motion for stay pending appeal.
Britton, Kayla D.	Associate	12/27/22	0.3	\$745.00	\$223.50	Review letter of credit application and reply to J. Argentina regarding issues with same.
Argentina, Joseph	Counsel	12/27/22	5.8	\$650.00	\$3,770.00	Research and drafting for objection to McGuckin motion for stay of sanctions order.
Argentina, Joseph	Counsel	12/28/22	6.8	\$650.00	\$4,420.00	Finish first draft of objection to McGuckin motion for stay.
Argentina, Joseph	Counsel	12/29/22	1.0	\$650.00	\$650.00	Finalize and file objection to McGuckin motion for stay (.7); confer with Gardner re: same
Argentina, Joseph	Counsel	12/29/22	0.5	\$650.00	\$325.00	Appeal of sanctions order: review McGuckin statement of issues, designations of record, District Court docket.
Argentina, Joseph	Counsel	12/29/22	1.1	\$650.00	\$715.00	Legal research regarding execution process for federal judgments in Pennsylvania.
Argentina, Joseph	Counsel	01/03/23	0.8	\$745.00	\$596.00	Multiple conferences with R. Coe and J. Gorman re: execution on sanctions judgment.
Argentina, Joseph	Counsel	01/03/23	2.3	\$745.00	\$1,713.50	Review rules in Philadelphia Court of Common Pleas, District Court, and Bankruptcy Court re: documents in support of execution on sanctions judgment (1.2); review sample documents from prior execution cases (1.1).
Argentina, Joseph	Counsel	01/03/23	0.4	\$745.00	\$298.00	Review notice of motion and related e-mail correspondence with court regarding hearing on stay motion.
Coe, Richard E.	Partner	01/03/23	0.3	\$865.00	\$259.50	Review research on letters of credit.
Argentina, Joseph	Counsel	01/04/23	3.9	\$745.00	\$2,905.50	Prepare for hearing on motion for stay: review key cases (1.8); draft argument outline
Argentina, Joseph	Counsel	01/04/23	1.9	\$745.00	\$1,415.50	Attend hearing on motion for stay (.4); post-hearing call with R. Coe (.5); post-hearing call with W. Gardner (.6); post-hearing email correspondence with court personnel regarding docket entries (.2): calendar key deadlines (.2).
Coe, Richard E.	Partner	01/04/23	0.3	\$865.00	\$259.50	Attend hearing on appeal bond.
Coe, Richard E.	Partner	01/04/23	0.5	\$865.00	\$432.50	Conference with J. Argentina re: hearing on appeal bond.
Morgan, Brian P.	Partner	01/05/23	0.5	\$865.00	\$432.50	Review statement of issues and pleadings/transcripts related to advice of counsel defense.
Argentina, Joseph	Counsel	01/05/23	0.8	\$745.00	\$596.00	Sanctions appeal: review McGuckin and PVI briefing on sanctions and related email with FDBR appeals team.
Taticchi, Mark D.	Partner	01/05/23	2.3	\$790.00	\$1,817.00	Analyze potential waiver of appellate issues by appellants McGuckin and PVI.
Argentina, Joseph	Counsel	01/06/23	0.4	\$745.00	\$298.00	Short initial analysis of 303(i) argument raised in McGuckin's statement of issues on appeal in sanctions.
Argentina, Joseph	Counsel	01/06/23	2.6	\$745.00	\$1,937.00	Review docket and designate additional entries for appeals of sanction and trustee order.

Argentina, Joseph	Counsel	01/10/23	0.4	\$745.00	\$298.00	Draft, revise, and coordinate filing of entry of appearance for appeals of Sanctions order.
Argentina, Joseph	Counsel	01/10/23	0.3	\$745.00	\$223.50	Finalize and file record designations for appeals of Sanctions order.
Argentina, Joseph	Counsel	01/10/23	0.3	\$745.00	\$223.50	Finalize and file record designations for appeals of Trustee order.
Argentina, Joseph	Counsel	01/11/23	0.4	\$745.00	\$298.00	Confer with R. Coe re: McGuckin collection issues.
Argentina, Joseph	Counsel	01/13/23	1.2	\$745.00	\$894.00	Analysis of McGuckin collection issues.
Argentina, Joseph	Counsel	01/18/23	0.7	\$745.00	\$521.50	Initial review of McGuckin brief on factors in support of a stay of sanctions.
Imani, Roya	Associate	01/18/23	0.1	\$685.00	\$68.50	Emails with J. Argentina regarding brief reply.
Taticchi, Mark D.	Partner	01/19/23	0.7	\$790.00	\$553.00	Analyze McGuckin brief in support of motion for stay pending appeal (0.5); correspond with R. Coe and J. Argentina re: same (0.2).
Argentina, Joseph	Counsel	01/19/23	0.4	\$745.00	\$298.00	Initial legal research regarding first element of consideration of stay and assign follow up research to R. Imani.
Argentina, Joseph	Counsel	01/19/23	2.7	\$745.00	\$2,011.50	Further review, research, and analysis of McGuckin brief in support of a stay of sanctions judgment and W. Gardner response.
Imani, Roya	Associate	01/19/23	0.2	\$685.00	\$137.00	Email with J. Argentina regarding stay standard.
Coe, Richard E.	Partner	01/19/23	0.4	\$865.00	\$346.00	Review McGuckin letter brief in support of stay and send email to J. Argentina re: same.
Coe, Richard E.	Partner	01/19/23	0.4	\$865.00	\$346.00	Conference with J. Argentina re: stay motion and avoidance claims.
Argentina, Joseph	Counsel	01/20/23	1.6	\$745.00	\$1,192.00	Research and analysis for reply brief on stay factors.
Argentina, Joseph	Counsel	01/20/23	1.9	\$745.00	\$1,415.50	Review research results from R. Imani regarding standards for granting stay during appeal (.8); confer with her on research and follow-up work (1.1).
Imani, Roya	Associate	01/20/23	3.0	\$685.00	\$2,055.00	Conduct legal research and analyze stay pending appeal standards; email and confer with J. Argentina re: same.
Imani, Roya	Associate	01/21/23	2.0	\$685.00	\$1,370.00	Conduct legal research and analyze success on the merits factor for stay pending appeal rule; email to J. Argentina re: same.
Argentina, Joseph	Counsel	01/23/23	1.1	\$745.00	\$819.50	Review additional research on standards for stay.
Argentina, Joseph	Counsel	01/23/23	2.5	\$745.00	\$1,862.50	Research and drafting of reply to McGuckin brief on stay factors.
Morgan, Brian P.	Partner	01/24/23	0.8	\$865.00	\$692.00	Review transcripts of sanctions hearing and analyze extent to which advice of counsel was raised.
Taticchi, Mark D.	Partner	01/24/23	1.4	\$790.00	\$1,106.00	Draft analysis re: potential advice-of- counsel defense (1.0); confer with R. Coe and J. Argentina re: same (0.4).
Argentina, Joseph	Counsel	01/24/23	6.5	\$745.00	\$4,842.50	Legal research and drafting for brief on motion for stay factors.
Argentina, Joseph	Counsel	01/24/23	0.2	\$745.00	\$149.00	Telephone conference with R. Coe regarding briefing on stay motion.
Coe, Richard E.	Partner	01/24/23	0.5	\$865.00	\$432.50	Review briefing and send email to J. Argentina re: advice of counsel defense.
Coe, Richard E.	Partner	01/24/23	0.2	\$865.00	\$173.00	Send email to J. Argentina re: McGuckin litigation and PVI operations for consideration in response brief.
Imani, Roya	Associate	01/24/23	1.5	\$685.00	\$1,027.50	Research advice-of-counsel defense issue; emails with J. Argentina.
Taticchi, Mark D.	Partner	01/25/23	0.2	\$790.00	\$158.00	Correspond with J. Argentina and R. Coe re: contents of opposition to motion for stay pending appeal.
Argentina, Joseph	Counsel	01/25/23	7.3	\$745.00	\$5,438.50	Legal research and drafting for brief on factors to stay bankruptcy order.
Coe, Richard E.	Partner	01/25/23	0.5	\$865.00	\$432.50	Review advice of counsel research forwarded by R. Imani.
Coe, Richard E.	Partner	01/25/23	0.2	\$865.00	\$173.00	Exchange emails re: response brief.
Imani, Roya	Associate	01/25/23	0.7	\$685.00	\$479.50	Research on advice-of-counsel defense; email with J. Argentina re: same.
Argentina, Joseph	Counsel	01/26/23	5.7	\$745.00	\$4,246.50	Research and drafting for reply brief on stay factors.
Argentina, Joseph	Counsel	01/27/23	2.8	\$745.00	\$2,086.00	Research and drafting for brief on stay factors.
Argentina, Joseph	Counsel	01/30/23	4.2	\$745.00	\$3,129.00	Further revisions to brief on stay and related email correspondence with R. Coe and M.
Taticchi, Mark D.	Partner	01/30/23	4.4	\$790.00	\$3,476.00	Revise draft opposition to McGuckin brief in support of motion for stay pending appeal.
Coe, Richard E.	Partner	01/30/23	0.7	\$865.00	\$605.50	Review Revel case and other research forwarded by R. Imani in preparation for reviewing opposition to motion to stay.

Taticchi, Mark D.	Partner	01/31/23	1.6	\$790.00	\$1,264.00	Revise draft opposition to McGuckin brief in support of motion for stay pending appeal.
Argentina, Joseph	Counsel	01/31/23	5.8	\$745.00	\$4,321.00	Multiple rounds of revisions to brief on stay and additional research; related email correspondences with R. Coe, M. Taticchi, and W. Gardner.
Coe, Richard E.	Partner	01/31/23	1.9	\$865.00	\$1,643.50	Review and revise opposition to motion to stay and exchange emails with J. Argentina and M. Taticchi re: same.
Argentina, Joseph	Counsel	02/01/23	4.1	\$745.00	\$3,054.50	Finalize and file brief on stay factors (3.7); confer with W. Gardner re: same (.4).
Coe, Richard E.	Partner	02/01/23	0.3	\$865.00	\$259.50	Review edits to opposition to stay motion.
Argentina, Joseph	Counsel	02/05/23	0.4	\$745.00	\$298.00	Calls with W. Gardner regarding McGuckin collection issues.
Argentina, Joseph	Counsel	02/08/23	5.0	\$745.00	\$3,725.00	Prepare for hearing on McGuckin motion for stay of sanctions judgment; review pleadings and case law; draft argument outline; analyze post-judgment interest issues (3.7); attend hearing (.6); post-hearing calls with R. Coe and W. Gardner (.7).
Argentina, Joseph	Counsel	02/08/23	2.7	\$745.00	\$2,011.50	Research Pennsylvania state and federal execution process and develop plan for executing on Sanctions Judgment.
Olivere, Beth A.	Paralegal	02/08/23	0.7	\$420.00	\$294.00	Order expedited transcript from 2/8/23 hearing; submit to Judge Chan's ECRU.
Coe, Richard E.	Partner	02/08/23	0.2	\$865.00	\$173.00	Attend hearing on motion to stay sanctions.
Coe, Richard E.	Partner	02/08/23	0.1	\$865.00	\$86.50	Conference with J. Argentina re: hearing on motion to stay sanctions.
Argentina, Joseph	Counsel	02/09/23	6.7	\$745.00	\$4,991.50	Execution on sanctions judgment; draft transfer papers; legal research on interest issues and joint and several liability issues; calls to EDPA bankruptcy clerk's office; draft letter requesting certified copy of judgment; coordinate pickup of judgment; email correspondence with client and FDBR personnel re: same.
Olivere, Beth A.	Paralegal	02/09/23	0.1	\$420.00	\$42.00	Call transcriber assigned to matter to pay for transcript re 2/8/23 hearing.
Olivere, Beth A.	Paralegal	02/10/23	0.1	\$420.00	\$42.00	Call with assigned transcriber confirming order and details of same.
Weinberg, Alec N.	Associate	02/10/23	0.4	\$580.00	\$232.00	Conference call with J. Argentina and K. Krimm re: federal judgment and execution in
Argentina, Joseph	Counsel	02/10/23	6.6	\$745.00	\$4,917.00	Attention to transfer of Sanctions Judgment to Montgomery County Court of Common Pleas; coordinate procurement of certified judgment and docket; multiple rounds of revisions to transfer documents; prepare affidavits; execute affidavit and have it notarized (including travel to notary public); multiple rounds of e-filings; multiple calls and emails Research ownership history of 585 County Line Road, Radnor PA in Montgomery County and Delaware County Tax Assessment Records.
Ciampitti, Denise A.	Paralegal	02/13/23	0.6	\$385.00	\$231.00	
Argentina, Joseph	Counsel	02/13/23	1.8	\$745.00	\$1,341.00	Review local rules for Delaware County Court of Common Pleas on entry of judgment; prepare praecipe and related forms; set up filing access for CCP e-filing system.
Argentina, Joseph	Counsel	02/13/23	1.2	\$745.00	\$894.00	Investigate McGuckin real estate assets.
Argentina, Joseph	Counsel	02/13/23	0.9	\$745.00	\$670.50	Complete filings in Montgomery County to transfer sanctions judgment.
Argentina, Joseph	Counsel	02/14/23	3.3	\$745.00	\$2,458.50	Finalize and execute documents for transfer of sanctions judgment to Delaware County; travel to notary public and have affidavit notarized; complete filing of transfer of sanctions judgment in Delaware County.
Argentina, Joseph	Counsel	02/14/23	0.3	\$745.00	\$223.50	Confer with W. Gardner regarding Sanctions Judgment and global settlement status.
Argentina, Joseph	Counsel	02/14/23	2.3	\$745.00	\$1,713.50	Research and analyze process for garnishment of McGuckin bank accounts in execution of sanctions judgment.
Argentina, Joseph	Counsel	02/15/23	2.2	\$745.00	\$1,639.00	Research execution procedures in Delaware County Court of Common Pleas; draft praecipe for writ of execution for Delaware CCP.
Argentina, Joseph	Counsel	02/15/23	4.8	\$745.00	\$3,576.00	Research execution procedures for money judgment in Montgomery County Court of Common Pleas; draft praecipe for writ of execution, notice, exemption form, garnishee interrogatories, and other files for attachment of McGuckin UBS account.
Argentina, Joseph	Counsel	02/16/23	2.8	\$745.00	\$2,086.00	Research and draft affidavit of non-military service (1.8); confer with W. Gardner re: execution (.3); refile all Delaware County transfer documents (.7).
Argentina, Joseph	Counsel	02/17/23	0.2	\$745.00	\$149.00	Sanctions Judgment: confer with R. Coe re: status of county filings.



Argentina, Joseph	Counsel	02/17/23	0.6	\$745.00	\$447.00	Sanctions Judgment: review status of transfer filings in Delaware County Court of Common Pleas and related email to client.
Weinberg, Alec N.	Associate	02/20/23	0.6	\$580.00	\$348.00	Discuss research assignment re: charging order and foreclosure process of 50/50 equity LLC with J. Argentina.
Argentina, Joseph	Counsel	02/20/23	2.7	\$745.00	\$2,011.50	Sanctions Judgment: legal research and analysis of obtaining a charging order under PA statute (2.2); confer with A. Weinberg regarding follow-up research on charging order (.3); email to R. Coe re: same (.2).
Weinberg, Alec N.	Associate	02/21/23	2.0	\$580.00	\$1,160.00	Strategy research re: foreclosing on co- members' interest and taking their share of control of the LLC.
Argentina, Joseph	Counsel	02/21/23	0.2	\$745.00	\$149.00	Sanctions Judgment: confer with client regarding execution.
Argentina, Joseph	Counsel	02/21/23	1.1	\$745.00	\$819.50	Sanctions Judgment: review statutes on charging order in execution on sanctions judgment (.5); additional research and analysis re: same (.6).
Coe, Richard E.	Partner	02/21/23	0.2	\$865.00	\$173.00	Review execution filings.
Argentina, Joseph	Counsel	02/22/23	1.2	\$745.00	\$894.00	Sanctions Judgment: draft writ of execution on PNC bank account and related papers.
Argentina, Joseph	Counsel	02/22/23	3.7	\$745.00	\$2,756.50	Sanctions Judgment: revise writ of execution for UBS bank account and related documents; file same in Montgomery County Prothonotary office; calls to Montgomery
Argentina, Joseph	Counsel	02/23/23	5.2	\$745.00	\$3,874.00	Sanctions Judgment: revise filings related to PNC garnishment; file same; refile UBS garnishment filings; confer with client re: same; research charging order issues; begin draft of motion for charging orders: research execution against corporate stock in
Argentina, Joseph	Counsel	02/24/23	4.1	\$745.00	\$3,054.50	Sanctions Judgment: prepare and coordinate delivery of service packages for Montgomery County Sheriff for service of writs of garnishment on McGuckin banks.
Argentina, Joseph	Counsel	02/27/23	1.2	\$745.00	\$894.00	Sanctions Judgment: legal research and analysis regarding ability to foreclose on limited partnership interests in Pennsylvania.
Argentina, Joseph	Counsel	02/27/23	0.3	\$745.00	\$223.50	Sanctions Judgment: meet with A. Weinberg regarding discovery in aid of execution
Argentina, Joseph	Counsel	02/27/23	2.7	\$745.00	\$2,011.50	Sanctions Judgment: draft motion for charging order against Rex L.P. limited partnership interests.
Weinberg, Alec N.	Associate	02/28/23	3.6	\$580.00	\$2,088.00	Begin drafting set of discovery in aid of execution; search for process for serving discovery.
Argentina, Joseph	Counsel	02/28/23	2.9	\$745.00	\$2,160.50	Appeals of Sanctions and Trustee Order: analyze potential for motion to dismiss appeals for failure to timely file briefs and draft short analysis for R. Coe and M. Taticchi (1.8); begin draft of motion (1.1).
Argentina, Joseph	Counsel	02/28/23	1.2	\$745.00	\$894.00	Appeals of Sanctions and Trustee Order: review and analyze apparent defects in exhibits listed on docket and draft email to FDBR team on the issue.
Argentina, Joseph	Counsel	02/28/23	0.2	\$745.00	\$149.00	Sanctions Judgment: e-mail correspondence with A. Wienberg regarding discovery in aid of execution.
Weinberg, Alec N.	Associate	03/01/23	0.7	\$580.00	\$406.00	Confer with J. Argentina to provide status update and discuss rules governing discovery; review letter sent by J. Argentina.
Argentina, Joseph	Counsel	03/01/23	1.8	\$745.00	\$1,341.00	Sanctions appeal: continue draft of motion to dismiss appeal.
Argentina, Joseph	Counsel	03/01/23	0.4	\$745.00	\$298.00	Sanctions judgment: review PA rules on discovery in aid of execution and service of same.
Weinberg, Alec N.	Associate	03/02/23	0.4	\$580.00	\$232.00	Research PA rules for discovery.
Argentina, Joseph	Counsel	03/02/23	0.4	\$745.00	\$298.00	Sanctions Judgment: call with client regarding status of collection.

Argentina, Joseph	Counsel	03/02/23	0.4	\$745.00	\$298.00	Call with R. Imani regarding research for motion to dismiss McGuckin appeals of Sanctions and Reconsideration orders.
Argentina, Joseph	Counsel	03/02/23	5.3	\$745.00	\$3,948.50	Sanctions and Trustee Order appeals: continue draft of motions to dismiss and analysis of related issues.
Imani, Roya	Associate	03/02/23	3.1	\$685.00	\$2,123.50	Conduct legal research and analyze issue related to FRBP 8018(a)(4); confer and emails with J. Argentina to discuss motions to dismiss the appeals.
Weinberg, Alec N.	Associate	03/03/23	2.7	\$580.00	\$1,566.00	Research PA rules for discovery; email J. Argentina findings on rules.
Argentina, Joseph	Counsel	03/03/23	0.3	\$745.00	\$223.50	Sanctions Appeal: continue draft of motion to dismiss appeal.
Argentina, Joseph	Counsel	03/03/23	0.4	\$745.00	\$298.00	Sanctions Judgment: call with Montgomery County Sheriff's office regarding service of writs of garnishment (.2); related email correspondence with R. Coe and client re: same and other collection matters (.2).
Imani, Roya	Associate	03/04/23	0.1	\$685.00	\$68.50	Email to J. Argentina regarding next steps in conducting legal research.
Argentina, Joseph	Counsel	03/05/23	0.2	\$745.00	\$149.00	E-mail correspondence with W. Gardner regarding sanctions and other issues.
Argentina, Joseph	Counsel	03/06/23	2.7	\$745.00	\$2,011.50	Sanctions appeal: continue draft of motion to dismiss.
Argentina, Joseph	Counsel	03/06/23	0.3	\$745.00	\$223.50	Sanctions judgment: coordinate internal assistance with execution proceedings.
Argentina, Joseph	Counsel	03/06/23	0.3	\$745.00	\$223.50	Call with W. Gardner regarding sanctions and other issues.
Argentina, Joseph	Counsel	03/07/23	0.5	\$745.00	\$372.50	Sanctions judgment: review docket in Montgomery CCP case (.2); contact Sheriff office regarding service of writs (.3).
Argentina, Joseph	Counsel	03/07/23	2.9	\$745.00	\$2,160.50	Sanctions: legal research and drafting for motion to dismiss appeal.
Argentina, Joseph	Counsel	03/08/23	1.1	\$745.00	\$819.50	Sanctions: review and implement edits to motion to dismiss by M. Taticchi (.3); email to FDBR team regarding various motion issues (.2); analyze rules on filing supporting briefs, proposed orders, service, motion format, exhibits, disclosures (.6).
Argentina, Joseph	Counsel	03/08/23	0.7	\$745.00	\$521.50	Sanctions judgment: calls with UBS bank and emails with client regarding writ to UBS (.6); check docket for certificate of service by Montgomery County Sheriff (.1).
Rank, Robin E.	Paralegal	03/09/23	0.8	\$440.00	\$352.00	Meeting with J. Argentina regarding next steps in collections; telephone call to Montgomery County Sheriff Office (left message).

Argentina, Joseph	Counsel	03/09/23	0.7	\$745.00	\$521.50	Sanctions Judgment: confer with R. Rank on collection status and next steps (.5); email to R. Rank re: same (.2).
Argentina, Joseph	Counsel	03/09/23	3.0	\$745.00	\$2,235.00	Sanctions Appeal: revise motion to dismiss appeal for lack of prosecution (.8); email correspondence with FDBR team regarding various issues (.5); email correspondence with counsel to McGuckin re: consent (.2); review letter filing from McGuckin requesting consolidation and briefing schedule (.2); revise declaration in support of motion to dismiss appeal (.3); prepare exhibits to declaration (.3); finalize, file, and serve motion and related documents (.7).
Argentina, Joseph	Counsel	03/09/23	0.2	\$745.00	\$149.00	Sanctions Judgment: confer with W. Gardner regarding collection matters.
Imani, Roya	Associate	03/09/23	2.0	\$685.00	\$1,370.00	Review and markup motion to dismiss appeals; incorporate internal team's edits to the motion to dismiss appeals; review declaration for the motion to dismiss appeals; draft Motion to Dismiss Appeal of Sanctions Order; confer and emails with J. Argentina regarding the motion to dismiss appeals.
Coe, Richard E.	Partner	03/09/23	0.4	\$865.00	\$346.00	Review and revise motion to dismiss appeal and exchange emails re: same.
Rank, Robin E.	Paralegal	03/10/23	0.2	\$440.00	\$88.00	Telephone call with Sheriff's office to confirm service on UBS and PNC Banks.
Argentina, Joseph	Counsel	03/10/23	0.7	\$745.00	\$521.50	Sanctions Appeal: analyze possible responses to letter filing from McGuckin requesting briefing schedule and assign follow-up analysis to R. Imani.
Argentina, Joseph	Counsel	03/10/23	1.9	\$745.00	\$1,415.50	Sanctions Judgment: e-mail correspondence with Gardner regarding collection issues (.4); e-mail correspondence with R. Rank regarding garnishment of BofA accounts (.3); continue draft of discovery in aid of execution (.8); confer with PNC bank personnel
Argentina, Joseph	Counsel	03/10/23	0.6	\$745.00	\$447.00	Sanctions appeal: legal research on standards for seeking extensions of deadlines to file appellate briefs.
Imani, Roya	Associate	03/10/23	1.5	\$685.00	\$1,027.50	Conduct legal research on local rules, the court clerk's procedures to figure out how appellants should have sought to consolidate the cases; email to J. Argentina, M. Taticchi, and C. Richard regarding same.
Coe, Richard E.	Partner	03/12/23	0.2	\$865.00	\$173.00	Review and revise response to letter requesting briefing schedule and consolidation and exchange emails re: same.
Rank, Robin E.	Paralegal	03/12/23	0.4	\$440.00	\$176.00	Research Bank of America Branches and whether they have a garnishment process.

Argentina, Joseph	Counsel	03/12/23	2.6	\$745.00	\$1,937.00	Sanctions Appeal: review and revise analysis by R. Imani regarding motion to request extension of appellate briefs (.8); draft letter response to McGuckin's letter request to consolidate appeals (1.8).
Rank, Robin E.	Paralegal	03/13/23	0.9	\$440.00	\$396.00	Meeting with J. Argentina to review writ preparation and filing.
Argentina, Joseph	Counsel	03/13/23	0.7	\$745.00	\$521.50	Sanctions judgment: confer with R. Rank on Bank of America garnishment.
Argentina, Joseph	Counsel	03/13/23	0.8	\$745.00	\$596.00	Sanctions appeal: finalize and file letter response to McGuckin letter requesting briefing schedule.
Coe, Richard E.	Partner	03/13/23	0.2	\$865.00	\$173.00	Review and revise letter re: consolidation of appeals.
Rank, Robin E.	Paralegal	03/14/23	2.7	\$440.00	\$1,188.00	Draft writ, accompanying attachments and interrogatories; edit documents.
Argentina, Joseph	Counsel	03/14/23	3.3	\$745.00	\$2,458.50	Sanctions Judgment: review emergency petition of Alison McGuckin related to PNC bank accounts, conferences with R. Coe and W. Gardner; legal research on tenancy in the entireties.
Argentina, Joseph	Counsel	03/14/23	2.2	\$745.00	\$1,639.00	Sanctions Judgment: Finish drafting discovery in aid of execution files.
Argentina, Joseph	Counsel	03/14/23	0.4	\$745.00	\$298.00	Sanctions Judgment: correspondence with R. Rank regarding Bank of America garnishment.
Rank, Robin E.	Paralegal	03/15/23	3.1	\$440.00	\$1,364.00	Attention to final edits of writ documents; meeting with J. Argentina to discuss filing process; file writ package and interrogatories; attention to court's communications regarding rejection of file; communications with court to determine the rejection issue and how to remedy; edit writ package and send to J. Argentina for review and signature.
Argentina, Joseph	Counsel	03/15/23	0.6	\$745.00	\$447.00	Sanctions Judgment: finalize discovery in aid of execution and coordinate delivery of same.
Argentina, Joseph	Counsel	03/15/23	1.2	\$745.00	\$894.00	Sanctions judgment: review writ of garnishment for Bank of America and related files (.6); confer with R. Rank re: revisions to writ papers (.4); email correspondence with R. Rank regarding filing status (.2).
Argentina, Joseph	Counsel	03/15/23	5.5	\$745.00	\$4,097.50	Sanctions judgment: review notice of hearing on petition to intervene (.2); e-mail correspondence with client re: same (.2); research legal issues in petition to intervene (2.1); analyze procedural issues in petition and appropriate response (1.4); draft answer to petition (1.6).
Rank, Robin E.	Paralegal	03/16/23	1.1	\$440.00	\$484.00	Refile writ package; file certificate of service for post-judgment discovery on McGuckin and Philadelphia Vascular Institute.

McHugh, Brendan P.	Associate	03/16/23	1.9	\$685.00	\$1,301.50	Conference call with R. Coe regarding matter (.1); analyze bankruptcy-related materials as part of onboarding to case team (1.8).
Argentina, Joseph	Counsel	03/16/23	0.4	\$745.00	\$298.00	Sanctions Judgment: supervise filing of new writ papers to garnish accounts at Bank of America.
Argentina, Joseph	Counsel	03/16/23	0.1	\$745.00	\$74.50	Sanctions appeal: review docket for any response to motion to dismiss appeal.
Argentina, Joseph	Counsel	03/16/23	7.3	\$745.00	\$5,438.50	Sanctions Judgment: legal research and drafting for answer to Petition to Intervene and related brief; e-mail correspondence with McGuckin counsel and FDBR personnel regarding hearing.
Imani, Roya	Associate	03/17/23	2.3	\$685.00	\$1,575.50	Research local rules regarding failure to timely respond; emails with internal team; draft letter to District Court regarding Motion to Dismiss.
Coe, Richard E.	Partner	03/17/23	0.2	\$865.00	\$173.00	Review and revise letter re: dismissal of appeal.
Coe, Richard E.	Partner	03/17/23	1.0	\$865.00	\$865.00	Conference with J. Argentina and M. Tatichhi re: collection efforts against McGuckin.
Argentina, Joseph	Counsel	03/17/23	0.8	\$745.00	\$596.00	Sanctions Appeal: review and revise draft letter granting Motion to Dismiss as uncontested and related email correspondence with FDBR personnel.
Argentina, Joseph	Counsel	03/17/23	1.0	\$745.00	\$745.00	Sanctions Judgment: conference with R. Coe and B. McHugh regarding petition to intervene.
Argentina, Joseph	Counsel	03/17/23	5.2	\$745.00	\$3,874.00	Sanctions Judgment: drafting and legal research for response to petition to intervene.
McHugh, Brendan P.	Associate	03/17/23	4.6	\$685.00	\$3,151.00	Prepare for strategy call with R. Coe and J. Argentina by analyzing Alison McGuckin's petition to intervene and related documents (. 5) and filings from Bankruptcy Court, including Judge Chan's 12/1/2022 Opinion and Order (.8); conference call with the same regarding strategy and next steps (1.0); research response deadlines and verification matters and e-mail R. Coe and J. Argentina regarding the same (.8); research and analyze case law regarding the interplay between fraudulent transfers and marital accounts/property (1.0); correspondence with R. Coe and J. Argentina regarding the same (. 5).
Argentina, Joseph	Counsel	03/18/23	0.3	\$745.00	\$223.50	Sanctions appeal: review and revise letter requesting granting motion to dismiss as uncontested.
Argentina, Joseph	Counsel	03/18/23	1.8	\$745.00	\$1,341.00	Sanctions judgment: legal research on fraudulent transfer actions in garnishment proceedings and draft analysis to R. Coe in connection with emergency petition to
Coe, Richard E.	Partner	03/18/23	0.1	\$865.00	\$86.50	Review revised draft of letter re: appeal dismissal.

Coe, Richard E.	Partner	03/18/23	0.4	\$865.00	\$346.00	Review research re: lien on joint bank accounts and send email to J. Argentina re: same.
Coe, Richard E.	Partner	03/19/23	0.1	\$865.00	\$86.50	Exchange emails with J. Argentina re: collection action.
Coe, Richard E.	Partner	03/19/23	0.1	\$865.00	\$86.50	Review letter re: dismissal of appeal.
McHugh, Brendan P.	Associate	03/20/23	2.3	\$685.00	\$1,575.50	Analyze correspondence from R. Coe and J. Argentina regarding strategy and next steps surrounding intervention petition (.4); analyze case-law related to the same (1.2); conference call with J. Argentina regarding hearing strategy and next steps (.7).
McHugh, Brendan P.	Associate	03/20/23	2.5	\$685.00	\$1,712.50	Analyze procedure and strategy to cause sheriff's sale of certain stock/equity held by James McGuckin.
Argentina, Joseph	Counsel	03/20/23	0.7	\$745.00	\$521.50	Sanctions Judgment: Call with B. McHugh re: levy on Rex equity and other execution issues and petition to intervene.
Argentina, Joseph	Counsel	03/20/23	0.2	\$745.00	\$149.00	Sanctions Appeal: finalize and file letter requesting dismissal as uncontested.
Argentina, Joseph	Counsel	03/20/23	0.8	\$745.00	\$596.00	Sanctions Judgment: call with client regarding petition to intervene and execution issues.
Argentina, Joseph	Counsel	03/20/23	3.4	\$745.00	\$2,533.00	Sanctions Judgment: email to McGuckin counsel regarding PNC bank statements (.1); email to R. Coe regarding petition to intervene (.2); revise answer to petition intervene and brief in support thereof (3.1).
Coe, Richard E.	Partner	03/20/23	0.2	\$865.00	\$173.00	Exchange emails with J. Argentina re: response to A. McGuckin petition to intervene.
Argentina, Joseph	Counsel	03/21/23	3.2	\$745.00	\$2,384.00	Sanctions Judgment: legal research and drafting regarding petition to intervene and set aside PNC Writ.
McHugh, Brendan P.	Associate	03/21/23	0.4	\$685.00	\$274.00	Correspondence with R. Coe and J. Argentina regarding response in opposition to emergency petition filed by Alison McGuckin.
McHugh, Brendan P.	Associate	03/21/23	3.6	\$685.00	\$2,466.00	Analyze, and review case law related to, the proper procedure and strategy to cause Sheriff's sale of certain stock/equity held by James McGuckin (2.9); e-mail correspondence with R. Coe and J. Argentina regarding the same (.7).
Rank, Robin E.	Paralegal	03/22/23	0.2	\$440.00	\$88.00	Communications with J. Argentina regarding document retrieval from court's site; obtain Answers to Interrogatories from PNC Bank; forward same to J. Argentina for review and upload to file.
Coe, Richard E.	Partner	03/22/23	0.9	\$865.00	\$778.50	Review additional research and review and revise opposition to emergency petition in collection action.

McHugh, Brendan P.	Associate	03/22/23	2.6	\$685.00	\$1,781.00	Analyze, and review case law related to, the proper procedure and strategy to cause Sheriff's sale of certain stock/equity held by James McGuckin (1.7); analyze issues related to garnishment and levy of real estate (.9).
McHugh, Brendan P.	Associate	03/22/23	2.4	\$685.00	\$1,644.00	Analyze and edit Answer to Alison McGuckin's Petition to Intervene (.7); analyze and edit Brief in support of the same (.9); analyze unsworn affidavit of J. Argentina in support of the same (.2); e-mail correspondence with J. Argentina and R. Coe regarding the same (.4); analyze further edits to Brief made by R. Coe (.2).
McHugh, Brendan P.	Associate	03/22/23	1.2	\$685.00	\$822.00	Analyze correspondence from J. Argentina regarding garnishment case from the E.D. Pa. and the case itself (.8); correspondence with R. Coe and J. Argentina regarding analysis of the same (.4).
Argentina, Joseph	Counsel	03/22/23	8.2	\$745.00	\$6,109.00	Sanctions Judgment: revise Answer to emergency petition to intervene, brief, draft affidavit and exhibits, certificate of service, certificate of compliance with public records policy; finalize and file and serve documents; related legal research and analysis; related email correspondence with FDBR personnel and opposing counsel.
Argentina, Joseph	Counsel	03/22/23	0.1	\$745.00	\$74.50	Sanctions appeal: review order consolidating appeals and related email correspondence with R. Coe and M. Taticchi.
McHugh, Brendan P.	Associate	03/23/23	1.2	\$685.00	\$822.00	Draft and edit proposed Order denying Alison McGuckin's petition to intervene and modify the PNC Writ (.6); research and analyze Montgomery County Local Rules related to presentation of documentary evidence during a hearing on an emergency petition (.6).
McHugh, Brendan P.	Associate	03/23/23	1.7	\$685.00	\$1,164.50	Correspondence with R. Coe and J. Argentina regarding oral argument on Alison McGuckin's emergency petition to intervene (.4); research and analyze Pennsylvania laws surrounding bank account ownership in connection with the same (.5); conference calls with J. Argentina regarding the strategy and research (.8).
Argentina, Joseph	Counsel	03/23/23	0.2	\$745.00	\$149.00	Sanctions Judgment: call with W. Gardner regarding garnishments.
Argentina, Joseph	Counsel	03/23/23	0.8	\$745.00	\$596.00	Sanctions Judgment: revise filing documents for answer to emergency petition to intervene and refile with Montgomery County court.
Argentina, Joseph	Counsel	03/23/23	6.5	\$745.00	\$4,842.50	Sanctions Judgment: prepare for hearing on Emergency Petition to intervene: prepare exhibit binders, draft argument outline, research local rules and Judge Moore's procedures regarding hearings; review and analyze bank account documents from counsel to petitioner.
Coe, Richard E.	Partner	03/23/23	0.2	\$865.00	\$173.00	VAC Appeal: Review opposition to motion to dismiss for lack of prosecution and exchange emails re: same.
Coe, Richard E.	Partner	03/23/23	0.2	\$865.00	\$173.00	Conference with J. Argentina re: collection efforts.

McHugh, Brendan P.	Associate	03/24/23	2.2	\$685.00	\$1,507.00	Prepare for hearing before Judge Moore regarding Alison McGuckin's emergency petition (1.0); attend the same with J. Argentina (1.2).
McHugh, Brendan P.	Associate	03/24/23	2.8	\$685.00	\$1,918.00	Strategy discussions with J. Argentina (.3); file notice of appearance with Montgomery County prothonotary (.2); in connection with determining discovery next steps, analyze interrogatories served on McGuckin and rules regarding discovery in aid of execution (2.3).
Argentina, Joseph	Counsel	03/24/23	1.1	\$745.00	\$819.50	Sanctions Appeal: review and analyze response to motion to dismiss and draft initial thoughts to FDBR group.
Argentina, Joseph	Counsel	03/24/23	3.7	\$745.00	\$2,756.50	Sanctions Judgment: hearing on Emergency Petition to intervene: revise argument outline (.8); attend hearing (2.0); post- hearing conference with B. McHugh (.3); submit new notice of appearance at Prothonotary office (.3); confer with client regarding hearing (.3).
Coe, Richard E.	Partner	03/25/23	0.2	\$865.00	\$173.00	Review pretrial order and form and exchange emails with J. Argentina and M. Taticchi re: same.
McHugh, Brendan P.	Associate	03/27/23	2.4	\$685.00	\$1,644.00	Analyze proposed order resolving emergency petition filed by Alison McGuckin (.2); prepare for conference call meeting with J. Argentina regarding strategy and next steps (.8); conference call meeting with J. Argentina regarding the same (1.4).
McHugh, Brendan P.	Associate	03/27/23	1.8	\$685.00	\$1,233.00	Research and analyze collection issues and correspondence with J. Argentina regarding same.
McHugh, Brendan P.	Associate	03/27/23	0.8	\$685.00	\$548.00	Develop and draft execution plan and action items.
Argentina, Joseph	Associate	03/27/23	0.6	\$745.00	\$447.00	Sanctions appeal: review Judge Scott's order scheduling pretrial conference and form 26(f) files; procedures; and Federal Rules 26 and 16.
Argentina, Joseph	Counsel	03/27/23	0.7	\$745.00	\$521.50	Sanctions Judgment: draft proposed order on emergency petition to intervene in PNC Writ.
Argentina, Joseph	Counsel	03/27/23	1.1	\$745.00	\$819.50	Sanctions Judgment: Conference with B. McHugh regarding collection strategies (Rule 3118 motion to compel turnover of stock; foreclosure on real estate; discovery in aid of execution; other matters).
Coe, Richard E.	Partner	03/27/23	0.2	\$865.00	\$173.00	Exchange emails re: reply in support of motion to dismiss and review research re: same.
Imani, Roya	Associate	03/27/23	0.1	\$685.00	\$68.50	Emails with internal counsels regarding research assignment.
Argentina, Joseph	Counsel	03/28/23	0.4	\$745.00	\$298.00	Sanctions judgment: coordinate revised set of invoice charges for motion to modify Sanctions Judgment.



Argentina, Joseph	Counsel	03/28/23	0.7	\$745.00	\$521.50	Sanctions appeal: draft email to opposing counsel with recommended process to comply with order scheduling Rule 16 pretrial conference; manage case calendar.
McHugh, Brendan P.	Associate	03/28/23	5.8	\$685.00	\$3,973.00	Develop and draft execution plan and action items (2.0); research and analysis of procedures to execute upon real property (2. 8) and privately held stock (.8); analyze correspondence from J. Argentina regarding the same (.2).
Argentina, Joseph	Counsel	03/28/23	0.2	\$745.00	\$149.00	Sanctions appeal: Initial review of reply brief.
McHugh, Brendan P.	Associate	03/29/23	7.0	\$685.00	\$4,795.00	Analyze strategy and procedure to execute upon McGuckin's real property (3.1), tangible personal property (2.5), and motor vehicles (1.1); e-mail correspondence with J. Argentina regarding the same and next steps (. 3).
Argentina, Joseph	Counsel	03/29/23	2.4	\$745.00	\$1,788.00	Sanctions Appeal: revise reply brief in support of motion to dismiss.
McHugh, Brendan P.	Associate	03/30/23	6.6	\$685.00	\$4,521.00	Analyze strategy and procedure to execute upon McGuckin's real property (2.8), tangible personal property (1.4), and motor vehicles (2.2); e-mail correspondence with J. Argentina regarding the same and next steps (. 2).
Argentina, Joseph	Counsel	03/30/23	0.7	\$745.00	\$521.50	Sanctions Appeal: finalize, file, and serve Reply in support of MTD.
Argentina, Joseph	Counsel	03/30/23	0.1	\$745.00	\$74.50	Sanctions judgment: email correspondence with B. McHugh regarding execution task list and next steps.
McHugh, Brendan P.	Associate	03/31/23	6.7	\$685.00	\$4,589.50	Analyze strategy and procedure to execute upon McGuckin's real property (1.6), tangible personal property (.7), and motor vehicles (1. 8); analyze strategy and procedural requirements for party and non-party discovery (2.4); e-mail correspondence with J. Argentina regarding all of the foregoing (. 2).
Rank, Robin E.	Paralegal	04/02/23	0.3	\$440.00	\$132.00	Sanctions Judgment: Review Collection Activity chart and next steps.
Argentina, Joseph	Counsel	04/02/23	1.1	\$745.00	\$819.50	Sanctions Appeal: review and revise draft form 26(f) document for submission to Judge Scott and related email correspondence with counsel to appellants.
McHugh, Brendan P.	Associate	04/03/23	3.7	\$685.00	\$2,534.50	Draft and edit list of collection-related tasks (1.2); correspondence with J. Argentina regarding the same (.2); conference call with J. Argentina regarding next steps and collection strategy (2.0); prepare for the same (.3).
McHugh, Brendan P.	Associate	04/03/23	2.6	\$685.00	\$1,781.00	Analyze responses to interrogatories in attachment received from PNC (.4); analyze procedural options for a failure to fully respond to the same (.7); analyze interrogatories in attachment served upon UBS (.2) and Bank of America (.2); create and analyze time line of tasks already completed (.6); analyze discovery in aid of execution already served on
Rank, Robin E.	Paralegal	04/03/23	0.4	\$440.00	\$176.00	Communications with J. Argentina regarding court's notice of order; obtain order from court and circulate to team for review; perform file maintenance tasks.
Argentina, Joseph	Counsel	04/03/23	2.8	\$745.00	\$2,086.00	Sanctions Judgment: review list of execution processes (.8); confer with B. McHugh regarding execution generally and motion to execute on Rex equity (2.0).

Argentina, Joseph	Counsel	04/03/23	0.8	\$745.00	\$596.00	Sanctions Appeal: attend Rule 16 conference (. 2); email correspondence with counsel to Appellants and Trustee regarding appeals (. 2); review and revise draft status reports (. 2); analyze magistrate judge issues (.2).
Argentina, Joseph	Counsel	04/03/23	0.2	\$745.00	\$149.00	Sanctions Judgment: review order granting petition to intervene and related email with FDBR personnel.
Argentina, Joseph	Counsel	04/04/23	1.2	\$745.00	\$894.00	Sanctions Judgment: legal research and analysis on execution proceedings related to Rex equity in bankruptcy court and draft summary analysis for B. McHugh.
McHugh, Brendan P.	Associate	04/04/23	5.7	\$685.00	\$3,904.50	Research and analyze whether multiple writs can be issued in enforcement proceedings (1. 5); research and analyze enforcement and collection options with regard to promissory notes (and associated debt owed to) McGuckin (3.2); correspondence with J. Argentina regarding the same (.8); analyze correspondence from J. Argentina regarding next steps
McHugh, Brendan P.	Associate	04/05/23	3.5	\$685.00	\$2,397.50	Meeting with J. Argentina regarding strategy and next steps for enforcement against McGuckin's debt and equity interests in Rex- related entities (2.3); analyze e-mail and attachments thereto in preparation for the same (.3); research and analyze charging order rules and procedures in preparation for the same (.9).
McHugh, Brendan P.	Associate	04/05/23	3.2	\$685.00	\$2,192.00	Analyze whether a charging order against a partnership interest is sought by petition or by motions (1.2); analyze rules and considerations for foreclosure of the same under 15 Pa.C.S. Section 8673(c) (2.0).
Argentina, Joseph	Counsel	04/05/23	2.0	\$745.00	\$1,490.00	Sanctions Judgment: conference with B. McHugh regarding results of research on execution issues and next steps.
McHugh, Brendan P.	Associate	04/06/23	4.5	\$685.00	\$3,082.50	Research and analysis regarding the process for a charging order and foreclosure upon a limited partnership interest, including case law regarding the time-related requirement therein (3.6); detailed e-mail correspondence with J. Argentina regarding the same (.9).
McHugh, Brendan P.	Associate	04/06/23	0.9	\$685.00	\$616.50	Analyze e-mail correspondence from J. Argentina regarding Shareholder Agreement for Rex Medical, Inc. (.2); analyze the Shareholder Agreement and respond with preliminary thoughts regarding the same (.7).
Argentina, Joseph	Counsel	04/06/23	2.6	\$745.00	\$1,937.00	Sanctions Judgment: review Rex corporate documents and analyze issues related to foreclosure of McGuckin equity; related email correspondence with B. McHugh.
McHugh, Brendan P.	Associate	04/07/23	3.5	\$685.00	\$2,397.50	Research and analyze case law and statutes governing default judgments against garnishees for failure to respond to interrogatories in attachment (1.7); analyze next steps with respect to writs and interrogatories served upon UBS and Bank of America in connection with the same (1.0); e- mail correspondence with J. Argentina and R. Rank regarding strategy and next steps with respect to URS and Bank of America (. 7).
McHugh, Brendan P.	Associate	04/07/23	3.7	\$685.00	\$2,534.50	Meeting with J. Argentina regarding detailed strategy and next steps (1.7); analyze Shareholder Agreement for Rex Medical, Inc. in preparation for the same (.8); analyze e-mails from J. Argentina about the same in preparation for the same (.2); analyze case law regarding charging orders against LLC interests in preparation for the same (.5); analyze e-mail from J. Argentina regarding additional garnishments writs against McGuckin business interests and update chart of outstanding tasks in connection with the same (. 5)
Rank, Robin E.	Paralegal	04/07/23	0.5	\$440.00	\$220.00	Communications with B. McHugh regarding obtaining documents from court docket; obtain service documents from court.
McHugh, Brendan P.	Associate	04/07/23	0.5	\$685.00	\$342.50	Draft and edit motion for charging order against James McGuckin's interest in Rex
Argentina, Joseph	Counsel	04/07/23	4.9	\$745.00	\$3,650.50	Sanctions Judgment: analyze transfer restrictions and other equity provisions in Rex Inc. organizational agreements (1.1); confer with B. McHugh re: same (1.7); email to client with analysis (.8); e-mail correspondence with B. McHugh regarding bank writs (.2); analyze Metro sale documents and draft assignment for new garnishment writs for McGuckin other centers for R. Rank (1. 1)

Rank, Robin E.	Paralegal	04/10/23	1.2	\$440.00	\$528.00	Team meeting regarding revising UBS and Bank of America writs and drafting additional
Argentina, Joseph	Counsel	04/10/23	1.8	\$745.00	\$1,341.00	Sanctions Judgment: review fee and expense details and begin formatting for motion to increase sanctions judgment.
Argentina, Joseph	Counsel	04/10/23	1.2	\$745.00	\$894.00	Sanctions judgment: call with FDBR team regarding new writs (.4); call with W. Gardner re: execution generally (.4); follow- up call with B. McHugh re: execution projects (.4).
Argentina, Joseph	Counsel	04/10/23	1.8	\$745.00	\$1,341.00	Sanctions Appeal: prepare for conference with Judge Scott; attend conference in Judge Scott's chambers (incl. travel); post- conference analysis and email correspondence with client; call with client.
McHugh, Brendan P.	Associate	04/10/23	0.9	\$685.00	\$616.50	Conference calls with R. Rank (.5) and J. Argentina (.4) regarding re-issuance of garnishments writs to UBS and Bank of America and other high priority collection items.
McHugh, Brendan P.	Associate	04/10/23	1.3	\$685.00	\$890.50	Analyze and determine proper Bank of America Entity to issue garnishment writ against (.9); e-mail correspondence with J. Argentina and R. Rank regarding the same (.4).
McHugh, Brendan P.	Associate	04/10/23	1.4	\$685.00	\$959.00	Analyze materials from Philadelphia Court of Common Pleas action brought by McGuckin against Metro Physicians Specialty Group in connection with garnishment of the entities listed therein.
McHugh, Brendan P.	Associate	04/10/23	2.0	\$685.00	\$1,370.00	Research and analyze strategy with respect to pursuing a charging order against McGuckin's various partnership interests.
Rank, Robin E.	Paralegal	04/11/23	1.6	\$440.00	\$704.00	Prepare Writs for Bank of America, N.A. and UBS Financial Services; send to J. Argentina and B. McHugh for review; find out on which county each potential property is located.
McHugh, Brendan P.	Associate	04/11/23	0.5	\$685.00	\$342.50	Analyze materials from Philadelphia Court of Common Pleas action brought by McGuckin against Metro Physicians Specialty Group in connection with garnishment of the entities listed therein.
Argentina, Joseph	Counsel	04/11/23	1.3	\$745.00	\$968.50	Sanctions Appeal: analyze Article 3 standing issues and equitable mootness and draft email to M. Taticchi re: same (1.1); confer with counsel to Trustee re: same (.2).
Rank, Robin E.	Paralegal	04/12/23	2.6	\$440.00	\$1,144.00	Edit writ pleadings for UBS Financial Services. Inc. and Bank of America, N.A.; communications with J. Argentina and B. McHugh; finalize documents for J. Argentina signature; e-file writ pleadings with Montgomery County Court.
McHugh, Brendan P.	Associate	04/12/23	1.9	\$685.00	\$1,301.50	Review and edit draft garnishment writs and interrogatories to UBS Financial Services, Inc. and Bank of America , N.A. (1.0); analyze correspondence from J. Argentina (.3) and R. Rank (.2) regarding the same; conference call with J. Argentina regarding the same and Trustee Opinion (.2); conference call with Montgomery County Court of Common Pleas to obtain e-filing credentials (.2).
McHugh, Brendan P.	Associate	04/12/23	1.4	\$685.00	\$959.00	Draft interrogatories in attachment directed to Metro Physicians Specialty Group, P.C.
Argentina, Joseph	Counsel	04/12/23	0.6	\$745.00	\$447.00	Sanctions Judgment: review and revise new writs for UBS and Bank of America and related interrogatories.
Argentina, Joseph	Counsel	04/12/23	0.2	\$745.00	\$149.00	Sanctions Judgment: confer with B. McHugh regarding new writs for UBS and Bank of America and related interrogatories.
Argentina, Joseph	Counsel	04/12/23	0.3	\$745.00	\$223.50	Sanctions appeal: review order setting oral argument and analyze potential briefing drafting issues (.2); e-mail correspondence with M. Taticchi re: same (.1).
Rank, Robin E.	Paralegal	04/13/23	0.5	\$440.00	\$220.00	Communications with Montgomery County Prothonotary regarding reason for filing rejection and how to remedy the rejection issue; communications with J. Argentina and B. McHugh regarding same.
Argentina, Joseph	Counsel	04/13/23	1.7	\$745.00	\$1,266.50	Sanctions Judgment: review and revise interrogatories for Metro and McGuckin centers (.9); e-mail correspondence and phone correspondence with B. McHugh re: same (.5); attention to additional writs against UBS and Bank of America (.3).

McHugh, Brendan P.	Associate	04/13/23	7.3	\$685.00	\$5,000.50	Draft interrogatories in attachment directed to Metro Physicians Specialty Group, P.C. (3.3); analyze filings from lawsuit in Philadelphia County between McGuckin and Metro in connection with the same (2.6); analyze strategy and relevant discovery rules in connection with the same (1.0); detailed e-mail to J. Argentina regarding the strategy and
Rank, Robin E.	Paralegal	04/14/23	2.0	\$440.00	\$880.00	Draft writ package for UBS Financial Services, Inc. and Bank of America, N.A.; prepare for filing and e-file writ package.
McHugh, Brendan P.	Associate	04/14/23	2.5	\$685.00	\$1,712.50	Draft interrogatories in attachment directed to Metro Physicians Specialty Group, P.C. and affiliated entities (2.2); correspondence with J. Argentina regarding the same (.3).
McHugh, Brendan P.	Associate	04/14/23	0.7	\$685.00	\$479.50	Analyze procedures to actually prompt a garnishee to turnover McGuckin's assets in its possession.
Argentina, Joseph	Counsel	04/14/23	0.8	\$745.00	\$596.00	Sanctions Judgment: confer with B. McHugh regarding interrogatories to Metro entities.
McHugh, Brendan P.	Associate	04/14/23	3.6	\$685.00	\$2,466.00	Meeting with J. Argentina regarding strategy and next steps (.7); prepare for the same by analyzing PNC interrogatory responses (.4), the terms of promissory note between McGuckin and Metro Physicians Specialty Group, P.C. (1.5); and the statutes and case law regarding the scope of interrogatories in attachment (1.0).
Rank, Robin E.	Paralegal	04/17/23	4.9	\$440.00	\$2,156.00	Pull documents from prothonotary website; draft letter to Sheriff for service; complete Sheriff's service request form; prepare services package to send to Sheriff; communications with Sheriff's office regarding amount of copies and fees; draft transfers of judgment for Lehigh, Philadelphia and Bucks Counties.
McHugh, Brendan P.	Associate	04/17/23	0.4	\$685.00	\$274.00	Analyze procedures to actually prompt a garnishee to turnover McGuckin's assets in its possession (.2); correspondence with J. Argentina regarding the same (.2).
McHugh, Brendan P.	Associate	04/17/23	4.1	\$685.00	\$2,808.50	Analyze procedures and requirements to transfer judgment to Bucks, Philadelphia, and Lehigh Counties (1.7); correspondence with J. Argentina and R. Rank regarding the same (.7); finalize interrogatories in attachment directed to Metro Physicians Specialty Group, P.C. and affiliated entities (1.4); correspondence with R. Rank and J. Argentina regarding
Argentina, Joseph	Counsel	04/17/23	2.5	\$745.00	\$1,862.50	Sanctions Judgment: review and revise interrogatories against Metro entities (.6); review and revise letter demanding responses to discovery from defendants (.9); confer with B. McHugh regarding discovery issues (.3); e-mail correspondence with counsel to UBS regarding writ (.2); confer with client regarding execution status (.2); coordinate transfer filings for judgment in Berks, Lehigh and Philadelphia counties (.3).
McHugh, Brendan P.	Associate	04/18/23	3.3	\$685.00	\$2,260.50	Research and analyze process and steps to enforce judgment against real property owned by McGuckin in Delaware County (3.0); conference call to Delaware County Sheriff's Office regarding the same (.3).
McHugh, Brendan P.	Associate	04/18/23	1.2	\$685.00	\$822.00	Conference call with J. Argentina regarding strategy and next steps (.5); prepare for the same by analyzing collection activity chart (.3); conference call with R. Rank updating her on the same (.2); follow-up e-mail correspondence with J. Argentina regarding the same
McHugh, Brendan P.	Associate	04/18/23	1.4	\$685.00	\$959.00	Analyze collection materials, other guidance, and statutes regarding proper rate for post-judgment interest calculations (1.1); e-mail correspondence with J. Argentina regarding the same (.3).
McHugh, Brendan P.	Associate	04/18/23	0.5	\$685.00	\$342.50	Complete process to obtain e-filing credentials in Bucks and Lehigh counties (.4); correspondence with case team regarding the same (.1).
Argentina, Joseph	Counsel	04/18/23	1.1	\$745.00	\$819.50	Sanctions Judgment: e-mail correspondence with FDBR personnel regarding new writ to UBS (.3); confer with B. McHugh regarding execution tasks and next steps (.5); final proof of coordinate delivery of discovery demand letter to defendants (.3)

McHugh, Brendan P.	Associate	04/19/23	4.7	\$685.00	\$3,219.50	Analyze secondary sources, case law, and other authority to determine process and next steps to enforce the Sanctions Judgment against McGuckin's real property in Delaware County (3.2); analyze secondary sources, case law, and other authority regarding rate to calculate interest on the same (.8); conference call and meeting with J. Argentina regarding the real property and interest considerations (.7)
Argentina, Joseph	Counsel	04/19/23	4.1	\$745.00	\$3,054.50	Sanctions Judgment: multiple rounds of revision to transfer documents for Lehigh, Bucks, and Philadelphia counties (2.4); set up filing credentials in Lehigh and Bucks county (.4); telephone conference with B. McHugh regarding real property execution issues (.7); analyze judgment interest rate issues (.3); assist R. Rank with filing transfer documents in Lehigh and Bucks counties (.3)
McHugh, Brendan P.	Associate	04/19/23	0.7	\$685.00	\$479.50	Correspondence with J. Argentina regarding writ of attachment served upon UBS Financial Services, Inc. and correspondence from counsel for UBS Financial Services, Inc. regarding the same (.2); analyze transfer related e-mails from R. Rank and respond to the same (.5).
Rank, Robin E.	Paralegal	04/19/23	3.9	\$440.00	\$1,716.00	Prepare documents for filing; file pleadings in Lehigh County; file pleadings in Bucks County; file pleadings in Philadelphia County.
Rank, Robin E.	Paralegal	04/20/23	2.9	\$440.00	\$1,276.00	Communications with J. Argentina regarding accepted and rejected filings; e-file Lehigh County documents; edit Lehigh County pleadings per court administration instructions and re-file; team meeting to discuss next steps for filing writs in Bucks, Lehigh, Philadelphia and Montgomery counties against clinics; draft writ package for Main Line Vascular Institute Limerick and send to J. Argentina and B. McHugh for review
Argentina, Joseph	Counsel	04/20/23	2.1	\$745.00	\$1,564.50	Sanctions Judgment: attention to fee detail exhibit to motion to increase judgment
Argentina, Joseph	Counsel	04/20/23	0.1	\$745.00	\$74.50	Sanctions Judgment: e-mail correspondence with counsel to McGuckin re: discovery.
Argentina, Joseph	Counsel	04/20/23	0.7	\$745.00	\$521.50	Sanctions Judgment: meeting with R. Rank and B. McHugh regarding status of collection activities (.4); confer with FDBR PA state court filing specialist regarding collection matters
McHugh, Brendan P.	Associate	04/20/23	4.2	\$685.00	\$2,877.00	Meeting with R. Rank and J. Argentina regarding next steps and strategy (.3); prepare for the same by analyzing writ packages and documents related to McGuckin's real property (.3); e-mail correspondence with counsel for UBS Financial Services, Inc. regarding writ of attachment and interrogatories filed and served upon UBS Financial Services, Inc. (.7); conference call with G. Clarke of the Delaware County Sheriff's office regarding process and requirements for the sale of real property and prepare for the same (.8); analyze strategy and next steps following conference call with G. Clarke and analyze e-mail from G. Clarke regarding notice of sale requirements and attachment thereto (.8); draft and send detailed e-mail to J. Argentina regarding the same (.6); draft letter to G. Clarke regarding forms required from Sheriff's office prior to a real property sale (.5); analyze e-mails from
Rank, Robin E.	Paralegal	04/21/23	0.3	\$440.00	\$132.00	Communications with team regarding changes to writ and drafting remaining writ
McHugh, Brendan P.	Associate	04/21/23	1.4	\$685.00	\$959.00	E-mail correspondence with J. Argentina regarding real property foreclosure (.2); analyze and edit writ and related documents addressed to Main Line Vascular Institute Limerick (.9); e-mail correspondence with J. Argentina and R. Rank regarding the same (.3).
McHugh, Brendan P.	Associate	04/21/23	1.0	\$685.00	\$685.00	Analyze the terms of promissory note between McGuckin and Metro Physicians Specialty Group, P.C.
Argentina, Joseph	Counsel	04/21/23	0.1	\$745.00	\$74.50	Sanctions Judgment: coordinate with title company on report on McGuckin residence.
Rank, Robin E.	Paralegal	04/22/23	2.8	\$440.00	\$1,232.00	Draft writ packages for Bucks, Montgomery, Philadelphia and Lehigh counties; draft filing instructions for E. Russell.

McHugh, Brendan P.	Associate	04/24/23	2.6	\$685.00	\$1,781.00	Draft and edit writs of attachment and interrogatories to entities purchased by Metro Physicians Specialty Group, P.C. (.7); conference call with J. Argentina regarding next steps given meeting between McGuckin and W. Gardner on Friday, April 21, 2023 (.3); analyze detailed e-mail correspondence from J. Argentina regarding the same (.8); analyze prerequisites to foreclosing on a charging order against a limited partnership interest, including case law in which foreclosure was permitted (.8).
Argentina, Joseph	Counsel	04/24/23	0.2	\$745.00	\$149.00	Sanctions Judgment: telephone conference with B. McHugh regarding stand still
Rank, Robin E.	Paralegal	04/25/23	0.7	\$440.00	\$308.00	Communications with E. Russell regarding receipt for Philadelphia County e-filing and e-filing writ packages; communications with J. Argentina and B. McHugh regarding status of e-filing writ packages; communications with B. McHugh regarding service affidavits by Montgomery County Sheriff on UBS Financial Services and Bank of America, N.A.; review docket, null service documents, circulate to team and save into files: review writ packages
McHugh, Brendan P.	Associate	04/25/23	4.1	\$685.00	\$2,808.50	Analyze writs of attachment and interrogatories directed to entities purchased by Metro Physicians Specialty Group, P.C. from McGuckin (.9); meetings with J. Argentina regarding the same (.9); detailed correspondence with R. Rank regarding next steps surrounding the same (.8); analyze publicly available business records via business records search in connection with the same (.6); analyze correspondence from J. Argentina regarding additional next steps and strategy (.4); additional correspondence with R. Rank regarding the same (.2); voice mail message for A. Morales (outside counsel to UBS) regarding
Argentina, Joseph	Counsel	04/25/23	2.8	\$745.00	\$2,086.00	Sanctions Judgment: review and revise form of writ papers for Metro entities (1.3); multiple conferences with B. McHugh regarding Metro garnishments (1.3); coordinate call with title company related to foreclosure action (.2).
Argentina, Joseph	Counsel	04/25/23	0.2	\$745.00	\$149.00	Sanctions Judgment: e-mail correspondence with FDBR personnel regarding stand still agreement (.1); e-mail correspondence with B. McHugh regarding service of bank writs and follow up for interrogatories (.1).
Argentina, Joseph	Counsel	04/26/23	0.4	\$745.00	\$298.00	Sanctions Judgment: conferences with B. McHugh regarding motion to compel McGuckin discovery and real property foreclosure.
McHugh, Brendan P.	Associate	04/27/23	1.1	\$685.00	\$753.50	Meeting with L. Ewashko (iSave Abstract) and J. Argentina regarding enforcement against real property owned by McGuckin in Delaware County (.4); prepare for the same by analyzing information required under the Pennsylvania Rules and the information received from the Delaware County Sheriff's office to date (.7).
Argentina, Joseph	Counsel	04/27/23	0.5	\$745.00	\$372.50	Sanctions Judgment: telephone conference with title company regarding real estate foreclosure action.
McHugh, Brendan P.	Associate	04/28/23	1.4	\$685.00	\$959.00	Analyze Sheriff's service forms in connection with real estate execution proceedings (.4); analyze additional case law support for motion to compel (1.0).
Argentina, Joseph	Counsel	04/28/23	0.6	\$745.00	\$447.00	Sanctions Judgment: begin revisions to motion to compel McGuckin discovery.
Taticchi, Mark D.	Partner	04/03/23	0.4	\$790.00	\$316.00	Review draft status-conference submissions (0.2); correspond with J. Argentina re: same
McHugh, Brendan P.	Associate	04/07/23	0.4	\$685.00	\$274.00	Confer with H. Grabbe regarding strategy and venue-related options and considerations.
Taticchi, Mark D.	Partner	04/10/23	2.5	\$790.00	\$1,975.00	Prepare for VAC appeal status conference (1.4); attend VAC appeal status conference (0.8); confer with J. Argentina re: same (0.3).
McHugh, Brendan P.	Associate	04/12/23	1.3	\$685.00	\$890.50	Confer with H. Grabbe regarding petition to intervene and accompanying order; analyze relevant documents from VAC case and e-mail the same to H. Grabbe.
Rank, Robin E.	Paralegal	04/18/23	0.4	\$440.00	\$176.00	Communications with Excel regarding change in service needs; communications with J. Argentina and B. McHugh regarding service on UBS Financial Services; communications with R. Longo regarding same.
Taticchi, Mark D.	Partner	04/20/23	0.3	\$790.00	\$237.00	Correspond with J. Argentina re: standards governing motion to dismiss appeal.

McHugh, Brendan P.	Associate	05/01/23	0.5	\$685.00	\$342.50	Conference call with J. Argentina regarding strategy and next steps (.1); e-mail correspondence with R. Rank regarding the same (.2); draft and edit writ-related
Rank, Robin E.	Paralegal	05/01/23	2.5	\$440.00	\$1,100.00	Revise and edit writ packages.
Rank, Robin E.	Paralegal	05/02/23	4.2	\$440.00	\$1,848.00	Revise and edit writ packages; draft transfer package for Northampton County; telephone calls to Philadelphia, Bucks, Northampton and Delaware County Sheriffs regarding services
McHugh, Brendan P.	Associate	05/02/23	1.4	\$685.00	\$959.00	Conference call with R. Rank regarding writ of attachment to various garnishees believed to be entities affiliated with McGuckin (.3); edit writ papers to the same (1.1).
McHugh, Brendan P.	Associate	05/02/23	1.9	\$685.00	\$1,301.50	Analyze complaint filed against McGuckin and various McGuckin-related entities by the Department of Justice, focusing on defendant entities as potential garnishees (.9); analyze docket from related Philadelphia dispute surrounding the entities to determine (.4); detailed e-mail correspondence with J. Argentina and R. Rank regarding the Complaint and Philadelphia docket (.6)
Argentina, Joseph	Counsel	05/02/23	5.3	\$745.00	\$3,948.50	Sanctions Judgment: review and revise form of writ papers for Metro entities (1.2); review DOJ complaint against McGuckin and Metro entities and analyze potential impact on collection (1.4); confer with client re: same (.4); email correspondence with FDBR personnel regarding collection issues (.2); continue revisions to motion to compel
McHugh, Brendan P.	Associate	05/03/23	0.6	\$685.00	\$411.00	Analyze complaint filed against McGuckin and various McGuckin-related entities by the Department of Justice (.3); correspondence with R. Rank regarding writs of attachment to the entities (.3).
McHugh, Brendan P.	Associate	05/03/23	0.5	\$685.00	\$342.50	Analyze Bank of America's Responses to Interrogatories in attachment (.3); correspondence with J. Argentina and R. Rank regarding the same (.2).
Rank, Robin E.	Paralegal	05/03/23	1.4	\$440.00	\$616.00	Attention to BofA answers to interrogatories; review interrogatories for language; communications with J. Argentina and B. McHugh regarding same.
Argentina, Joseph	Counsel	05/03/23	0.4	\$745.00	\$298.00	Sanctions Judgment: review and revise garnishment papers for Lehigh Valley Vascular and related email to R. Rank.
Argentina, Joseph	Counsel	05/03/23	0.3	\$745.00	\$223.50	Sanctions Judgment: review issues raised in DOJ complaint against McGuckin entities and revise instructions to R. Rank on writ papers.
Argentina, Joseph	Counsel	05/03/23	0.4	\$745.00	\$298.00	Sanctions Judgment: finalize and execute and have notarized documents for transfer of judgment to Northampton county.
Rank, Robin E.	Paralegal	05/04/23	4.3	\$440.00	\$1,892.00	Revise and edit writ package for Montgomery County; efile writ package with Montgomery County; attention to filing issues with Northampton County Court; revise and edit writ package for Bucks County; revise and edit writ package for Delaware County; prepare writ package for Philadelphia County.
McHugh, Brendan P.	Associate	05/04/23	0.8	\$685.00	\$548.00	Analyze strategy and next steps regarding enforcement against real property held by McGuckin in Delaware County.
McHugh, Brendan P.	Associate	05/04/23	0.6	\$685.00	\$411.00	Meeting with J. Argentina regarding motion to compel and enforcement against real
McHugh, Brendan P.	Associate	05/04/23	0.9	\$685.00	\$616.50	Analyze verification and affidavit requirements for motion practice (.6); correspondence with J. Argentina regarding the same (.3).
Argentina, Joseph	Counsel	05/04/23	1.1	\$745.00	\$819.50	Sanctions Judgment: review, finalize, execute and coordinate filing of writs for Lehigh Vascular and Metro.
Argentina, Joseph	Counsel	05/04/23	0.7	\$745.00	\$521.50	Sanctions Judgment: coordinate delivery of original signed documents to R. Rank for delivery to Northampton County prothonotary in order to transfer judgment there.
Taticchi, Mark D.	Partner	05/04/23	3.1	\$790.00	\$2,449.00	Review briefing on motion to dismiss appeals (1.3); prepare oral argument outline (1.8).
Rank, Robin E.	Paralegal	05/05/23	4.2	\$440.00	\$1,848.00	Revise Rule 236 Notice for Hampton County Transfer; prepare transfer package for Monroe County; draft writ package for Vascular Care Specialists, LLC, Pennsylvania Vascular Institutes, PC and PA Vascular Institute, LLC; prepare and file Metro Physicians Specialty Group, PC writ package in Bucks County District Court.



McHugh, Brendan P.	Associate	05/05/23	1.0	\$685.00	\$685.00	Analyze strategy and next steps regarding sheriff's sale of McGuckin's real property.
Argentina, Joseph	Counsel	05/05/23	3.7	\$745.00	\$2,756.50	Sanctions Judgment: review, revise, execute, and deliver documents for garnishments of certain Metro entities (2.6); obtain e-filing credentials in Monroe County, PA (.6); confer with B. McHugh regarding collection matters (.5)
Taticchi, Mark D.	Partner	05/05/23	6.5	\$790.00	\$5,135.00	Review bankruptcy court briefing and orders in preparation for appellate argument (5.4); review district court briefing in preparation for appellate argument (1.1).
Taticchi, Mark D.	Partner	05/07/23	3.5	\$790.00	\$2,765.00	Review case law re: dismissal for failure to prosecute appeal (2.2); outline arguments for appellate argument (1.3).
Rank, Robin E.	Paralegal	05/08/23	3.3	\$440.00	\$1,452.00	Edit the Monroe transfer documents and send to J. Argentina for signature; organize filed documents for Bucks, Montgomery and Delaware counties; refile Delaware County writ; revise writ package for Montgomery County.
Argentina, Joseph	Counsel	05/08/23	2.4	\$745.00	\$1,788.00	Sanctions Appeal: prepare for and attend hearing on Gardner motion to dismiss and Trustee joinder (1.9); post-hearing conference with counsel to Trustee (.3); post-hearing call with client (.2).
Argentina, Joseph	Counsel	05/08/23	2.0	\$745.00	\$1,490.00	Sanctions Judgment: finalize, execute, and deliver several documents in support of garnishments of Metro entities (.9); conference with B. McHugh regarding motion to compel discovery (.4); review UBS bank responses to interrogatories (.4); conference with client re: collection status (.3)
Taticchi, Mark D.	Partner	05/08/23	3.4	\$790.00	\$2,686.00	Outline arguments for oral argument (0.8); prepare oral presentation for appellate argument (0.6); participate in oral argument (2.0).
Rank, Robin E.	Paralegal	05/09/23	5.4	\$440.00	\$2,376.00	Prepare and file Montgomery County writs; filing motion to compel; prepare Northampton filing; prepare and file Philadelphia County writ; prepare status update;
Argentina, Joseph	Counsel	05/09/23	1.3	\$745.00	\$968.50	Sanctions Judgment: review, finalize, execute and deliver to R. Rank documents in support of writs of garnishment for certain Metro entities (.7); conferences with B. McHugh regarding motion to compel discovery from McGuckin (.6)
Argentina, Joseph	Counsel	05/09/23	2.8	\$745.00	\$2,086.00	Sanctions Judgment: review and prepare 2022 time entries for motion to increase
Bonsell, Kaitlyn E.	Paralegal	05/09/23	2.4	\$375.00	\$900.00	Cite-and record-check Motion to Compel discovery responses.
McHugh, Brendan P.	Associate	05/10/23	4.2	\$685.00	\$2,877.00	Analyze strategy and next steps related to execution against real property owned by McGuckin (2.7); correspondence with L. Ewashko regarding required title work in connection with the same (.3); correspondence with R. Rank regarding the same (.5); meeting with J. Argentina regarding the same and regarding other execution next steps
McHugh, Brendan P.	Associate	05/10/23	1.6	\$685.00	\$1,096.00	Analyze UBS responses to interrogatories in attachment (.2); analyze Bank of America responses to interrogatories in attachment and evaluate strategy and next steps regarding the same (.4); analyze correspondence from J. Argentina regarding additional writs required (.2); analyze correspondence from J. Argentina regarding writs to entities affiliated with Metro Physicians Specialty Group PC (.8)
Argentina, Joseph	Counsel	05/10/23	2.8	\$745.00	\$2,086.00	Sanctions Judgment: draft assignment lists for FDBR personnel related to garnishment writs (.5); conferences with B. McHugh regarding writs, motion to compel discovery, and other collection issues (.8); review information from client regarding additional accounts and related discussions with Gardner (.7); finish preparing fee and expense details for motion to increase sanctions judgment (.8)
Rank, Robin E.	Paralegal	05/10/23	3.7	\$440.00	\$1,628.00	Draft Monroe County writ package; organize file.
Argentina, Joseph	Counsel	05/11/23	0.8	\$745.00	\$596.00	Sanctions judgment: video conference with B. McHugh and R. Rank regarding collection activities and next steps (.5); review and execute praecipe and interrogatories for PaVI garnishment (.3).



Rank, Robin E.	Paralegal	05/11/23	4.7	\$440.00	\$2,068.00	Meeting with J. Argentina and B. McHugh to discuss status and next steps in collection efforts; efile certificate of service for motion documents in Montgomery County; file writ package in Monroe County; draft writ documents for real property garnishment.
McHugh, Brendan P.	Associate	05/11/23	0.9	\$685.00	\$616.50	Meeting with J. Argentina and R. Rank regarding next steps (.5); prepare for the same by analyzing the same (.4).
McHugh, Brendan P.	Associate	05/11/23	1.6	\$685.00	\$1,096.00	Conference call with counsel for Bank of America, N.A. (garnishee) regarding its interrogatory responses and prepare for the same (.4); follow-up analysis regarding the same (.7); detailed e-mail to J. Argentina and R. Rank regarding the same (.5).
McHugh, Brendan P.	Associate	05/11/23	1.1	\$685.00	\$753.50	Draft and finalize certificate of service for Rule to Show Cause (.4); correspondence with R. Rank regarding the same (.1); draft, finalize, and send letter to D. Heim, J. McGuckin, and PVI serving the Rule to Show Cause (.4); e-mail correspondence with D. Heim regarding
McHugh, Brendan P.	Associate	05/11/23	1.6	\$685.00	\$1,096.00	Draft and edit writ package related to real property levy (.6); draft and edit affidavit of interested parties in connection with the same (1.0).
Rank, Robin E.	Paralegal	05/12/23	0.3	\$440.00	\$132.00	Attention to writs issued by Montgomery County.
McHugh, Brendan P.	Associate	05/12/23	2.1	\$685.00	\$1,438.50	Draft and edit writ package related to real property levy (.8); analyze secondary sources in connection with the same (.9); correspondence with J. Argentina regarding the same (.4).
McHugh, Brendan P.	Associate	05/12/23	0.2	\$685.00	\$137.00	Voicemail message for L. Ewashko regard title- related work.
McHugh, Brendan P.	Associate	05/12/23	0.9	\$685.00	\$616.50	Analyze compliant filed by Department of Justice against McGuckin and entities affiliated with him.
McHugh, Brendan P.	Associate	05/12/23	1.4	\$685.00	\$959.00	Analyze Montgomery County writs issued against Metro-related entities (.8); detailed correspondence with R. Rank and J. Argentina regarding the same (.6).
McHugh, Brendan P.	Associate	05/12/23	0.5	\$685.00	\$342.50	Analyze correspondence from counsel for UBS Financial Services, Inc. regarding garnishment of accounts held with UBS (.2); confer with J. Argentina regarding the same (.1); respond to the same (.2).
Argentina, Joseph	Counsel	05/12/23	0.6	\$745.00	\$447.00	Sanctions Judgment: review correspondence from UBS counsel and confer with B. McHugh regarding alleged marital and trust accounts.
Rank, Robin E.	Paralegal	05/15/23	1.5	\$440.00	\$660.00	Communications with Montgomery County prothonotary.
Argentina, Joseph	Counsel	05/15/23	0.8	\$745.00	\$596.00	Sanctions Judgment: review email correspondence from Montgomery County prothonotary related to writs of garnishment of Metro entities and related email correspondence with R. Rank (.4); review rule to show cause related to motion to compel McGuckin discovery and related email correspondence with B. McHugh (.4).
McHugh, Brendan P.	Associate	05/15/23	2.4	\$685.00	\$1,644.00	Continue to draft and edit Rule 3129.1 affidavit in connection with real property levy (.8); correspondence with J. Argentina regarding McGuckin's deadline to respond to Gardner's motion to compel (.2); correspondence with R. Rank regarding additional garnishment writ package to financial institutions (.2); correspondence with J. Argentina regarding strategy and next steps related to real property levy (.4); additional correspondence with R. Rank regarding the same (.5); analyze correspondence from L. Ewashko (isaveabstract) and next steps regarding the same (.2).
McHugh, Brendan P.	Associate	05/15/23	1.2	\$685.00	\$822.00	Correspondence with R. Rank regarding writ issues to Pennsylvania Vascular Institute PC and Vascular Care Specialists, LLC, in Montgomery County (.4); analyze strategy regarding the same and research procedures related to re-issuance of a writ of execution (.8).
Rank, Robin E.	Paralegal	05/16/23	1.9	\$440.00	\$836.00	Communications with J. Argentina regarding Montgomery County writ acceptance; prepare Goldman Sachs & Co. writ package for filing with Philadelphia County.
McHugh, Brendan P.	Associate	05/16/23	3.9	\$685.00	\$2,671.50	Draft and edit documents related to enforcement against real property held by McGuckin (1.5); analyze next steps related to the same (.6); edit writ of attachment against Goldman Sachs & Co. and related interrogatories (1.4); correspondence with R. Rank (.2) and J. Argentina (.2) regarding the same.

McHugh, Brendan P.	Associate	05/16/23	1.8	\$685.00	\$1,233.00	Meeting with J. Argentina regarding strategy and next steps for writs of garnishment and levy (1.4); analyze certain PA Rules of Civil Procedure in preparation for the same (.4).
Argentina, Joseph	Counsel	05/16/23	0.5	\$745.00	\$372.50	Sanctions Judgment: continue preparation of motion to revise sanctions judgment.
Argentina, Joseph	Counsel	05/16/23	0.7	\$745.00	\$521.50	Sanctions Judgment: review and revise writ package to garnish Goldman accounts and interrogatories.
Argentina, Joseph	Counsel	05/16/23	3.9	\$745.00	\$2,905.50	Sanctions Judgment: review and revise writ package documents for McGuckin foreclosure action (2.2); confer with B. McHugh on foreclosure issues and revise documents accordingly (1.4); confer with client re: execution status (.2); email to title company
McHugh, Brendan P.	Associate	05/17/23	0.7	\$685.00	\$479.50	Research and analyze applicability of Pennsylvania's Deficiency Judgment Act to certain real property sales and regarding priority of liens.
McHugh, Brendan P.	Associate	05/17/23	2.6	\$685.00	\$1,781.00	Research and analyze potential real property interest holders who would not have recorded interests (1.6); draft and edit Rule 3129 affidavit in connection with the same (.3); meeting with J. Argentina regarding the same (.4); analyze property records for Delaware County in connection with the same (.3).
Argentina, Joseph	Counsel	05/17/23	0.4	\$745.00	\$298.00	Sanctions Judgment: confer with B. McHugh regarding real and personal property writ
Argentina, Joseph	Counsel	05/17/23	1.6	\$745.00	\$1,192.00	Sanctions Judgment: Legal research for motion to increase sanctions judgment (1.2); continue draft of motion and exhibits (.4).
Rank, Robin E.	Paralegal	05/18/23	6.6	\$440.00	\$2,904.00	Review court website to download signed writs; communications with Montgomery County Sheriff's office for instructions and fees to submit writ packages for service; draft transmittal letter to Montgomery County for service of writ packages on Main Line Vascular, Pennsylvania Vascular Institute and Vascular Care Specialists; prepare Order for Service for each entity; prepare writ package for each entity to be sent to Montgomery County Sheriff; prepare and send instructions to LAA for delivery of writ packages to Montgomery County for service on entities; telephone call to Bucks County for instruction and fees for service of writ package for Metro Physicians Specialty Group; communications with Delaware County Sheriff for instructions and fees for service of
Argentina, Joseph	Counsel	05/18/23	0.2	\$745.00	\$149.00	Email correspondence with R. Rank and B. McHugh re: collection tasks.
McHugh, Brendan P.	Associate	05/18/23	0.9	\$685.00	\$616.50	Correspondence with R. Rank regarding service of writ packages (.4); analyze correspondence from R. Rank (.2) and J. Argentina (.2) regarding the same; analyze filing related issues with writs filed in Philadelphia County (.1).
Rank, Robin E.	Paralegal	05/19/23	0.4	\$440.00	\$176.00	Telephone call with Bucks County Sheriff's office regarding service request details; prepare writ package and send for service; update filing/service tracking sheet.
McHugh, Brendan P.	Associate	05/19/23	0.7	\$685.00	\$479.50	Research and analyze applicability of Pennsylvania's Deficiency Judgment Act to certain real property sales and regarding priority of liens and also analyze requirements related to the same.
McHugh, Brendan P.	Associate	05/19/23	1.1	\$685.00	\$753.50	Analyze interrogatory responses received from UBS in the mail (.7); correspondence with J. Argentina regarding the same (.2); analyze correspondence from R. Rank regarding writs of execution (.2).
McHugh, Brendan P.	Associate	05/19/23	0.9	\$685.00	\$616.50	Meeting with J. Argentina regarding strategy and next steps.
Argentina, Joseph	Counsel	05/19/23	1.7	\$745.00	\$1,266.50	Sanctions Judgment: review UBS's responses to interrogatories and analyze potential fraudulent transfer claims (.6); confer with B. McHugh re: same, foreclosure action, and other collection issues (.9); email to client re: status of garnishments (.2).
McHugh, Brendan P.	Associate	05/22/23	3.0	\$685.00	\$2,055.00	Draft and edit documents requests to UBS Financial Services, Inc. (2.3); analyze strategy and next steps with respect to execution against real property owned by McGuckin (.5); correspondence with L. Ewashko regarding status of title search in connection with the

Argentina, Joseph	Counsel	05/22/23	0.9	\$745.00	\$670.50	Sanctions Judgment: legal research and analysis on Rule 60 motion to increase sanctions judgment amount and related procedural issues.
McHugh, Brendan P.	Associate	05/23/23	3.3	\$685.00	\$2,260.50	Analyze title-related report received from L. Ewashko (ISave Abstract) (1.7); meeting with J. Argentina regarding the same and next steps/strategy for execution against real property owned by McGuckin (1.3); analyze follow up correspondence from L. Ewashko.
McHugh, Brendan P.	Associate	05/23/23	2.1	\$685.00	\$1,438.50	Draft and edit documents requests to UBS Financial Services, Inc.
Rank, Robin E.	Paralegal	05/23/23	0.5	\$440.00	\$220.00	Calculate interest and costs, revise writ documents for McGuckin residence.
McHugh, Brendan P.	Associate	05/23/23	0.7	\$685.00	\$479.50	Analyze service-related issue concerning garnishment writ to PA Vascular Institute LLC (.4); correspondence with J. Argentina regarding the same (.3).
McHugh, Brendan P.	Associate	05/23/23	1.2	\$685.00	\$822.00	Draft and edit writ package for execution against real property owned by McGuckin, including drafting praecipe for writ of execution, writ of execution, required affidavit, and legal property description (.9); e-mail correspondence with J. Argentina and R. Rank.
McHugh, Brendan P.	Associate	05/23/23	0.4	\$685.00	\$274.00	Analyze correspondence from D. Ciampitti regarding Delaware County real estate records (.2); analyze next steps regarding the same (.2).
Argentina, Joseph	Counsel	05/23/23	0.1	\$745.00	\$74.50	Sanctions Judgment: e-mail correspondence with Monroe County Sheriff's office regarding service of writ of garnishment.
Argentina, Joseph	Counsel	05/23/23	2.1	\$745.00	\$1,564.50	Sanctions Judgment: initial review results of title search on McGuckin residence (.5); confer and jointly analyze search results in depth with B. McHugh and discuss next steps (1.2); e-mail correspondence with D. Ciampitti regarding new property encumbrances on McGuckin residence (.2); e-mail correspondence with title search company regarding
Argentina, Joseph	Counsel	05/23/23	1.8	\$745.00	\$1,341.00	Sanctions Judgment: legal research on federal appellate and bankruptcy rules related to indicative rulings when asking bankruptcy court for order relating to judgment on appeal and other jurisdictional issues.
Ciampitti, Denise A.	Paralegal	05/23/23	0.4	\$385.00	\$154.00	Research Delaware County Recorder of Deeds for documents filed for Tax Parcel No. 36-02- 000950-00, 583 County Line Road; emails - J. Argentina.
Rank, Robin E.	Paralegal	05/24/23	4.3	\$440.00	\$1,892.00	Draft transmittal letter to Delaware County Sheriff; confirm fees and copies with Sheriff's office; prepare writ package for delivery to sheriff; meeting with B. McHugh to discuss writ for McGuckin residence; review calculations and legal description and send to J. Argentina for review and signature; telephone call with Delaware County prothonotary to confirm documents to file; review affidavit from process service to correct deficiencies in the Philadelphia County and Bucks County service packages; communications with B. McHugh regarding conversation with prothonotary and filing documents; file writ for McGuckin.
McHugh, Brendan P.	Associate	05/24/23	1.8	\$685.00	\$1,233.00	Analyze whether Act 91 (PA Homeowner's Emergency Mortgage Assistance Program) applies to judgment executions against real estate (1.1); analyze whether Delaware County has a foreclosure diversion program in connection with the same (.7).
McHugh, Brendan P.	Associate	05/24/23	2.0	\$685.00	\$1,370.00	Draft and edit praecipe for writ of execution, form writ of execution, and required affidavit in connection with execution against real estate owned by McGuckin (1.1); correspondence with J. Argentina and R. Rank regarding the same (.3); conference call meetings with R. Rank regarding the same (.6).
McHugh, Brendan P.	Associate	05/24/23	0.3	\$685.00	\$205.50	Draft and edit notice of sale in connection with execution against real property owned by McGuckin.
McHugh, Brendan P.	Associate	05/24/23	1.0	\$685.00	\$685.00	Conference call meetings with J. Argentina regarding execution strategy.
McHugh, Brendan P.	Associate	05/24/23	1.3	\$685.00	\$890.50	Analyze and research statutory and other authority for recovery of costs in connection with the writ of execution.

Argentina, Joseph	Counsel	05/24/23	3.4	\$745.00	\$2,533.00	Sanctions Judgment: additional review and revisions to writ and affidavit in support related to foreclosure on McGuckin real property (1.3); related conferences with B. McHugh (1.2); legal research and analysis on Deficiency Judgment Act related to foreclosure (.4); email correspondence with Sheriff of Monroe County (.2); email correspondence with title company (1); review web county records for McGuckin real
Rank, Robin E.	Paralegal	05/25/23	2.1	\$440.00	\$924.00	Review information received from Philadelphia County Sheriff regarding additional documents; download and complete documents; prepare writ package and update transmittal letter; request check for Sheriff fees; review information received from Bucks County Sheriff regarding additional documents; download and complete documents; prepare writ package and update transmittal letter; request check for Sheriff fees
McHugh, Brendan P.	Associate	05/25/23	4.2	\$685.00	\$2,877.00	Draft and edit notice of sale (2.0) and advertising description (1.2) required for Sheriff's sale of real property; research and analyze legal requirements regarding the same (1.0).
McHugh, Brendan P.	Associate	05/25/23	0.7	\$685.00	\$479.50	Research and analyze requirements for foreclosure against a limited partnership interest (.4); research and analyze whether certain federal and state statutes might create liability in connection with foreclosure against real estate (.3).
McHugh, Brendan P.	Associate	05/25/23	1.4	\$685.00	\$959.00	Conference calls with Delaware County Sheriff's office regarding requirements for a Sheriff's sale of real property (.4); draft checklist and outline of the same (1.0).
McHugh, Brendan P.	Associate	05/25/23	0.4	\$685.00	\$274.00	Draft and edit praecipe for entry of appearance in the Delaware County matter.
Argentina, Joseph	Counsel	05/25/23	0.3	\$745.00	\$223.50	Sanctions Judgment: confer with B. McHugh regarding second wave of filings for foreclosure action and other issues.
Rank, Robin E.	Paralegal	05/26/23	1.3	\$440.00	\$572.00	Communications with J. Argentina regarding Northampton County transfer pleadings and acceptance of Delaware County writ on McGuckin residence; communications with B. McHugh regarding filing of NOA in Delaware County
Argentina, Joseph	Counsel	05/26/23	0.2	\$745.00	\$149.00	Sanctions Judgment: review notice of filing acceptance from Northampton County and Delaware County and related email correspondence with R. Rank.
McHugh, Brendan P.	Associate	05/26/23	1.0	\$685.00	\$685.00	Analyze statutes relevant to foreclosure upon real estate to determine applicability (.6); analyze "hand money" requirement for Sheriff's sale in Delaware County (.4).
McHugh, Brendan P.	Associate	05/26/23	0.4	\$685.00	\$274.00	Correspondence with R. Rank regarding praecipe for entry of appearance and other
McHugh, Brendan P.	Associate	05/30/23	0.6	\$685.00	\$411.00	Analyze documents filed in Montgomery County action by the Sheriff's office (.2); analyze pleadings from action between McGuckin and Metro Physicians Specialty Group PC to determine identify of Mary Suter (.3); correspondence with J. Argentina regarding the
Argentina, Joseph	Counsel	05/30/23	2.4	\$745.00	\$1,788.00	Sanctions Judgment: legal research and analysis on federal appellate civil and bankruptcy rules on indicative rulings and draft email analysis for M. Taticchi and review his responses to issues (1.6); continue draft of motion (.8).
Rank, Robin E.	Paralegal	05/30/23	1.1	\$440.00	\$484.00	Review Montgomery County Court website to download service confirmations for Main Line, Pennsylvania Vascular and Vascular Care Specialists; update tracking spreadsheet; review Delaware County website to download Issued Writ for McGuckin Residence; update tracking spreadsheet and circulated all pleadings; prepare writs for filing with Northampton County Court for Lehigh Valley Vascular Institute
Taticchi, Mark D.	Partner	05/30/23	0.4	\$790.00	\$316.00	Correspond with J. Argentina re: modification of sanctions judgment.
Rank, Robin E.	Paralegal	05/31/23	2.6	\$440.00	\$1,144.00	Telephone call with Northampton County prothonotary regarding details and fees for filing writ; revise pleadings and calculate fees to date; draft Order for service; prepare instructions for mailing to Northampton County Prothonotary and request checks; communications with J. Argentina and B. McHugh regarding filing and service on Lehigh Valley Vascular Institute in Northampton County

McHugh, Brendan P.	Associate	05/31/23	2.4	\$685.00	\$1,644.00	Finalize draft notice of sale (1.2) and advertising description (.6) in connection with real property sale of McGuckin's property in Delaware County; correspondence with R. Rank and J. Argentina regarding the same and next steps related to the same (.6).
McHugh, Brendan P.	Associate	05/31/23	1.9	\$685.00	\$1,301.50	Analyze correspondence from R. Rank and J. Argentina regarding garnishment writs (.4); prepare for and meet with P. Chang-Sundin regarding charging order research under 15 Pa. C.S. Section 8673 (1.0); continue to draft and edit additional discovery to be served upon UBS Financial Services, Inc. and other financial institutions (.5).
Argentina, Joseph	Counsel	05/31/23	1.1	\$745.00	\$819.50	Sanctions judgment: finalize, execute, and deliver Northampton County writ documents to R. Rank for filing (.3); legal research and analysis on appellate and bankruptcy rules on modification of judgment while on appeal (.8).
Rank, Robin E.	Paralegal	06/01/23	1.5	\$440.00	\$660.00	Telephone call with Marina from Bucks County Sheriff's office regarding additional copies of writ; draft letter to Bucks County Sheriff sending additional requested copies of writ; team meeting to discuss procedure for writ against McGuckin residence and next steps; review Court procedures for filing and writ.
McHugh, Brendan P.	Associate	06/01/23	0.6	\$685.00	\$411.00	Analyze deadlines for garnishees to respond to interrogatories in attachments (.4); correspondence with R. Rank regarding the same (.2).
McHugh, Brendan P.	Associate	06/01/23	0.9	\$685.00	\$616.50	Analyze returns of service for writs and interrogatories to Pennsylvania Vascular Institute, PC, Vascular Care Specialists, LLC, and Main Line Vascular Institute, LLC and analyze certain service related issues for the same (.6); correspondence with J. Argentina and R. Rank regarding the same (.3).
McHugh, Brendan P.	Associate	06/01/23	1.0	\$685.00	\$685.00	Meeting with J. Argentina and R. Rank regarding strategy and next steps (.5); prepare for the same by analyzing outstanding issues (.5).
McHugh, Brendan P.	Associate	06/01/23	2.9	\$685.00	\$1,986.50	Finalize draft document requests to UBS Financial Services, Inc. (1.8); research and analyze fraudulent transfer law in connection with the same (.9); correspondence and conference call with J. Argentina regarding the same (.2).
Argentina, Joseph	Counsel	06/01/23	0.9	\$745.00	\$670.50	Sanctions Judgment: video conference with B. McHugh and R. Rank regarding garnishment writs and real property foreclosure matters (.5); review research assignment for charging order procedure (.2); coordinate service tracking project for garnishment
McHugh, Brendan P.	Associate	06/02/23	3.2	\$685.00	\$2,192.00	Research and analyze validity of service by the Sheriff upon Pennsylvania Vascular Institute PC (2.2); further draft and edit discovery requests to UBS Financial Services, Inc. (.5); analyze Pennsylvania Fraudulent Transfer law in connection with the same (.5).
McHugh, Brendan P.	Associate	06/05/23	3.5	\$685.00	\$2,397.50	Analyze service-related rules for service of a garnishment writ upon garnishee (.6); analyze returns of service in connection with the same (.2); analyze legal framework for a fraudulent transfer action and potential facts related to the same (1.2); analyze materials related to the applicability and requirements of the Fair Debt Collection Practices Act (.9); meet with K. Krimm regarding Articles of Incorporation for Rex (.3); analyze strategy and next steps for real property writ of execution (.3).
McHugh, Brendan P.	Associate	06/05/23	0.6	\$685.00	\$411.00	Correspondence with P. Chang-Sundin regarding research regarding charging order against an LP interest (.2); meet with P. Chang-Sundin regarding the same (.4).
Rank, Robin E.	Paralegal	06/06/23	1.1	\$440.00	\$484.00	Prepare writ package to send to Northampton County Court of Common Pleas; draft filing
McHugh, Brendan P.	Associate	06/06/23	0.7	\$685.00	\$479.50	Meeting with J. Argentina regarding garnishment writs and real property enforcement (.2); prepare for the same by analyzing status of the same (.3); correspondence with R. Rank regarding the same (.2).
McHugh, Brendan P.	Associate	06/06/23	0.9	\$685.00	\$616.50	Analyze and research recourse and options when a garnishee fails to respond to interrogatories in attachment.

McHugh, Brendan P.	Associate	06/06/23	0.6	\$685.00	\$411.00	Analyze strategy regarding possible forced sale of McGuckin's equity interest in Rex Medical, L.P. (.3); analyze strategy and next steps surrounding enforcement against McGuckin's real property (.3).
Argentina, Joseph	Counsel	06/06/23	0.4	\$745.00	\$298.00	Sanctions Judgment: confer with B. McHugh regarding real property foreclosure and return of service issues (.2); assign new writ of garnishment draft to R. Rank (.2).
Rank, Robin E.	Paralegal	06/07/23	2.1	\$440.00	\$924.00	Draft writ package for Rex Medical, L.P.; follow up on status of and further research for Northampton, Delaware and Montgomery County writs.
McHugh, Brendan P.	Associate	06/07/23	0.5	\$685.00	\$342.50	Correspondence with J. Argentina regarding garnishment writ to Rex Medical LP (.3); correspondence with R. Rank regarding enforcement against real property held by McGuckin in Delaware County (.2).
McHugh, Brendan P.	Associate	06/07/23	3.7	\$685.00	\$2,534.50	Research and analyze the duration of a garnishment attachment under Pennsylvania law (1.2); research and analyze statutes and case law regarding termination and dissolution procedures for the same (1.8); detailed correspondence with J. Argentina regarding the
Argentina, Joseph	Counsel	06/07/23	0.2	\$745.00	\$149.00	Sanctions Judgment: assign research project to B. McHugh regarding garnishment terminations in PA.
Argentina, Joseph	Counsel	06/07/23	0.3	\$745.00	\$223.50	Sanctions Judgment: analyze potential issues in Rex garnishment writ vs charging order.
McHugh, Brendan P.	Associate	06/08/23	2.7	\$685.00	\$1,849.50	Conference call with J. Argentina regarding strategy and next steps (.3); research and analyze dissolution and termination of a garnishment writ (.8); meeting (.2) and follow-up correspondence (.2) with R. Rank regarding execution against McGuckin's real property (.3); analyze draft writ to Rex LP (.2) and correspondence from J. Argentina and R. Rank regarding the same (.2); analyze PA Rules of Civil Procedure related to inclusion of costs in a writ of execution (.5).
Argentina, Joseph	Counsel	06/08/23	0.7	\$745.00	\$521.50	Sanctions Judgment: review, revise and execute writ documents related to Rex Medical.
Argentina, Joseph	Counsel	06/08/23	0.6	\$745.00	\$447.00	Sanctions Judgment: review results of legal research on termination of garnishments and related phone conference with B. McHugh.
Rank, Robin E.	Paralegal	06/08/23	0.4	\$440.00	\$176.00	Communications with B. McHugh regarding my conversation with Delaware County Sheriff's office.
McHugh, Brendan P.	Associate	06/09/23	2.2	\$685.00	\$1,507.00	Finalize drafts of advertising description and notice of sale (1.3); detailed correspondence with R. Rank regarding next steps with regard to the same (.7); confer with P. Chang-Sundin regarding research related to foreclosure on a partnership charging order (.2).
Argentina, Joseph	Counsel	06/09/23	1.3	\$745.00	\$968.50	Sanctions Judgment: review and revise supplementary documents (advertisement form; property description; notice of sheriff sale) related to foreclosure sale of McGuckin real property and related conference with B. McHugh.
Rank, Robin E.	Paralegal	06/12/23	2.9	\$440.00	\$1,276.00	Communications with B. McHugh regarding Sheriff's service package; telephone call with Delaware Sheriff's office to clarify service package details; prepare package to send to E-mail correspondence with W. Gardner re: global settlement terms.
Argentina, Joseph	Counsel	06/12/23	0.3	\$745.00	\$223.50	Analyze research conducted by B. Smith (summer associate) regarding inapplicability of mortgage foreclosure statutes and regulations to execution against real property to enforce a money judgment (.7); conduct follow-up research regarding the same (1.0).
McHugh, Brendan P.	Associate	06/12/23	1.7	\$685.00	\$1,164.50	Finalize notice of sale and advertising description to be sent to Sheriff's office in connection with execution against real property (.6); e-mail correspondence with R. Rank regarding the same (.5); follow-up meeting with R. Rank regarding next steps for such execution (.2); research and analyze service-related deadlines for the writ of execution and other execution documents (.7).
Argentina, Joseph	Counsel	06/12/23	0.3	\$745.00	\$223.50	Sanctions Judgment: review research and analysis on whether certain debt collection statutes are implicated by foreclosure action against McGuckin real property.

Argentina, Joseph	Counsel	06/12/23	2.2	\$745.00	\$1,639.00	Sanctions Judgment: review McGuckin objection to Gardner's motion to compel discovery responses (.7); analyze authorities cited in McGuckin objection (.6); confer with B. McHugh on hearing and next steps (.7); e-mail correspondence with W. Gardner re: same
Rank, Robin E.	Paralegal	06/13/23	0.7	\$440.00	\$308.00	Attend to details of writ package being sent to Delaware County Sheriff for service; final review of writ package to be sent to Sheriff.
McHugh, Brendan P.	Associate	06/14/23	0.7	\$685.00	\$479.50	Conference call with R. Rank regarding execution against real property and next steps for the same (.2); follow-up correspondence with R. Rank regarding the same (.3); strategy call with J. Argentina (.2).
Rank, Robin E.	Paralegal	06/14/23	0.3	\$440.00	\$132.00	Communications with B. McHugh regarding service of notice on County and City departments; communications with J. Argentina regarding Sheriff's package to send to
Argentina, Joseph	Counsel	06/14/23	0.6	\$745.00	\$447.00	Sanctions Judgment: e-mail and phone correspondence with B. McHugh regarding hearing on motion to compel McGuckin discovery (.4); e-mail correspondence with W. Gardner re: McGuckin real property foreclosure status (.2).
McHugh, Brendan P.	Associate	06/15/23	0.7	\$685.00	\$479.50	Analyze forms submitted to Delaware County Sheriff's Office regarding real property sale; correspondence with R. Rank regarding the same; conference call with J. Argentina regarding the same.
McHugh, Brendan P.	Associate	06/15/23	0.3	\$685.00	\$205.50	Analyze additional research conducted by B. Smith (summer associate) regarding inapplicability of mortgage foreclosure statutes and regulations to execution against real property to enforce a money judgment (.2); correspondence with J. Argentina regarding
McHugh, Brendan P.	Associate	06/15/23	1.5	\$685.00	\$1,027.50	Analyze and edit draft document demands to UBS Financial Services (.6); analyze whether such requests should be styled as third-party discovery (.9).
Argentina, Joseph	Counsel	06/15/23	0.1	\$745.00	\$74.50	Sanctions Judgment: e-mail correspondence with W. Gardner re: motion to compel
Argentina, Joseph	Counsel	06/15/23	0.7	\$745.00	\$521.50	Sanctions Judgment: email correspondence with Goldman personnel regarding writ (.2); review writ files (.3); related email correspondence with FDBR personnel re: same (.2).
Argentina, Joseph	Counsel	06/15/23	3.3	\$745.00	\$2,458.50	Sanctions Judgment: draft discovery in aid of execution for McGuckin banks (requests for documents) and related email correspondence with B. McHugh.
Argentina, Joseph	Counsel	06/15/23	0.3	\$745.00	\$223.50	Sanctions Judgment: email and phone correspondence with FDBR personnel regarding potential issue with sale notice for Sheriff sale of McGuckin real property.
Rank, Robin E.	Paralegal	06/15/23	0.8	\$440.00	\$352.00	Docket search for Sheriff affidavit filings on various writs; communications with B. McHugh regarding instructions to Delaware County Sheriff's office; telephone call with Delaware County Sheriff's office regarding service instructions.
McHugh, Brendan P.	Associate	06/16/23	0.3	\$685.00	\$205.50	Correspondence from J. Argentina regarding garnishment writ to Goldman Sachs.
Argentina, Joseph	Counsel	06/16/23	1.1	\$745.00	\$819.50	Sanctions Judgment: call with Goldman personnel regarding writ package (.5); assign new Goldman writ package draft to R. Rank (.2); email to Goldman personnel regarding McGuckin data (.2); confer with Gardner re: Goldman status (.2).
McHugh, Brendan P.	Associate	06/19/23	0.2	\$685.00	\$137.00	Correspondence with J. Argentina regarding next steps and strategy.
McHugh, Brendan P.	Associate	06/20/23	0.9	\$685.00	\$616.50	Conference call with Montgomery County Court Administration regarding pending motion to compel; analyze local rules in connection with the same.
McHugh, Brendan P.	Associate	06/20/23	2.4	\$685.00	\$1,644.00	Edit discovery requests to UBS Financial Services, Inc.; correspondence with J. Argentina regarding the same.
Argentina, Joseph	Counsel	06/20/23	0.1	\$745.00	\$74.50	Sanctions Judgment: e-mail correspondence with B. McHugh regarding motion to compel discovery from McGuckin.
McHugh, Brendan P.	Associate	06/21/23	0.4	\$685.00	\$274.00	Meeting with B. Smith (summer associate) regarding his research regarding inapplicability of mortgage foreclosure statutes and regulations to execution against real property to enforce a money judgment.
McHugh, Brendan P.	Associate	06/21/23	0.2	\$685.00	\$137.00	Meeting with J. Argentina regarding next steps.

Rank, Robin E.	Paralegal	06/21/23	0.9	\$440.00	\$396.00	Draft writ package for Goldman Sachs Bank, USA, calculate fees and send to J. Argentina for review and signature; update tracking spreadsheet with Northampton filing.
Rank, Robin E.	Paralegal	06/22/23	0.5	\$440.00	\$220.00	Communications with J. Argentina regarding filing Goldman Sachs Bank writ package; update fees, prepare and file writ package.
McHugh, Brendan P.	Associate	06/22/23	3.4	\$685.00	\$2,329.00	Finalize requests for production of documents and things to UBS Financial Services, Inc. (.5); draft and finalize requests for production of documents to Bank of America, N.A. (1.1) and PNC Bank, N.A. (1.1); draft and send service letters and e-mails for the same (.7).
McHugh, Brendan P.	Associate	06/22/23	1.6	\$685.00	\$1,096.00	Strategy meeting with J. Argentina (.3); analyze correspondence from S. Hillman (counsel for PNC Bank, N.A.) regarding discovery requests served upon her (.2); analyze and research arguments regarding S. Hillman's argument that a garnishee is not a party subject to requests for production of documents (1.1).
Argentina, Joseph	Counsel	06/22/23	1.3	\$745.00	\$968.50	Sanctions Judgment: review Philadelphia Sheriff's returned order for service (.1); review and revise writ to Goldman and execute praecipe and interrogatories (.3); confer with B. McHugh re: PNC demand for subpoena (.2); review PNC email demand for subpoena (.1); review and revise bank discovery template (.4); review letter from Goldman regarding
McHugh, Brendan P.	Associate	06/23/23	0.9	\$685.00	\$616.50	Conference call with A. Morales (counsel to UBS) regarding discovery served upon it and prepare for the same (.6); strategy meeting with J. Argentina following the same (.3).
McHugh, Brendan P.	Associate	06/23/23	0.7	\$685.00	\$479.50	Analyze research memorandum from P. Chang-Sundin (summer associate) regarding foreclosure against an LP interest (.5); confer with P. Chang-Sundin regarding follow-up
McHugh, Brendan P.	Associate	06/23/23	0.4	\$685.00	\$274.00	Analyze correspondence from Goldman Sachs regarding interrogatories served upon it (.2); correspondence with J. Argentina regarding writ to Peripheral Vascular Institute (.2).
Rank, Robin E.	Paralegal	06/23/23	0.8	\$440.00	\$352.00	Communications with J. Argentina and B. McHugh regarding Philadelphia County Sheriff's Service Orders received; review and organize into file and update tracking spreadsheet; attention to letter from Goldman Sachs and update information on spreadsheet.
McHugh, Brendan P.	Associate	06/23/23	3.8	\$685.00	\$2,603.00	Analyze and research case law and statutes regarding S. Hillman's (counsel for PNC Bank, N.A.) argument that a garnishee is not a party subject to requests for production of documents (1.5); e-mail correspondence with J. Argentina regarding the same (.7); meeting with J. Argentina regarding strategy and next steps related to the same (1.0); draft e-mail response to S. Hillman (.6)
McHugh, Brendan P.	Associate	06/23/23	0.2	\$685.00	\$137.00	Correspondence with J. Fiorentino (assistant to Discovery Master) regarding availability for argument on Gardner's motion to compel.
Argentina, Joseph	Counsel	06/23/23	0.2	\$745.00	\$149.00	Review notice of failed service for Peripheral Vascular and related email with B. McHugh.
Argentina, Joseph	Counsel	06/23/23	1.9	\$745.00	\$1,415.50	Sanctions Judgment: review letter from Goldman Sachs regarding McGuckin accounts (.4); legal research regarding whether garnishee is a party for subpoena purposes (.8); draft email to Goldman personnel re: letter and next steps (.4); call with Goldman in-house counsel re: McGuckin accounts (.3).
Argentina, Joseph	Counsel	06/23/23	3.2	\$745.00	\$2,384.00	Sanctions Judgment: legal research on whether a garnishee can be subject to requests for discovery or a subpoena is required (2.2); conferences with B. McHugh re: same (1.0).
Argentina, Joseph	Counsel	06/26/23	1.6	\$745.00	\$1,192.00	Sanctions Judgment: meetings with B. McHugh regarding motion to compel McGuckin discovery and bank garnishment issues.
McHugh, Brendan P.	Associate	06/26/23	2.3	\$685.00	\$1,575.50	Sanctions Judgment: meetings with J. Argentina regarding strategy and next steps surrounding Gardner's motion to compel and document requests from PNC, UBS, and Bank of America (garnishees) (2.0); prepare for the same by analyzing relevant documents
McHugh, Brendan P.	Associate	06/26/23	0.9	\$685.00	\$616.50	Sanctions Judgment: conference call meeting with S. Hillman (counsel for PNC) regarding discovery served upon PNC (.2); prepare for the same by analyzing arguments made by S. Hillman over e-mail (.3); analyze detailed follow up correspondence from S. Hillman regarding PNC's position and develop strategy for the same (.4).



McHugh, Brendan P.	Associate	06/27/23	1.5	\$685.00	\$1,027.50	Sanctions Judgment: correspondence with A. Morales regarding discovery served upon UBS (.9); correspondence with S. Hillman regarding discovery served upon PNC (.2); correspondence with J. Argentina regarding the same (.2); analyze and respond to e-mail from J. Fiorentino (assistant to James Mannion, Discovery Master) regarding hearing on
McHugh, Brendan P.	Associate	06/27/23	0.3	\$685.00	\$205.50	Sanctions Judgment: analyze updated research memorandum from P. Chang-Sundin (summer associate) regarding foreclosure against an LP interest.
McHugh, Brendan P.	Associate	06/27/23	3.3	\$685.00	\$2,260.50	Sanctions Judgment: research and analyze requirements for a document subpoena to PNC and UBS under the Pennsylvania Rules of Civil Procedure (2.0); conference calls with Montgomery County Prothonotary's Office regarding the same (.2); strategy calls with J. Argentina regarding discovery, including the same (.2); draft and finalize letter to Montgomery County Prothonotary in connection with the same (.9)
Argentina, Joseph	Counsel	06/27/23	0.8	\$745.00	\$596.00	Sanctions Judgment: review draft email to UBS regarding discovery (.2); review email analysis from counsel to PNC and advise B. McHugh re: response and next steps (.3); telephone conference and email correspondence with counsel to Goldman Sachs regarding accounts and extension to respond to interrogatories (.3)
McHugh, Brendan P.	Associate	06/28/23	0.2	\$685.00	\$137.00	Sanctions Judgment: finalize letter to Montgomery County Prothonotary's Office requesting document subpoenas (in connection with subpoenas to PNC and Bank of
McHugh, Brendan P.	Associate	06/28/23	1.4	\$685.00	\$959.00	Sanctions Judgment: draft and edit subpoena for documents to PNC Bank, N.A. (.9); draft and edit required notice of intent to serve the same (.4).
McHugh, Brendan P.	Associate	06/28/23	0.6	\$685.00	\$411.00	Sanctions Judgment: call with Delaware County Sheriff's Office regarding real property sale and prepare for the same (.3); send memorandum to file regarding the same (.3).
Argentina, Joseph	Counsel	06/29/23	0.7	\$745.00	\$521.50	Sanctions Judgment: draft email analysis to client regarding questions on UBS bank account issues.
McHugh, Brendan P.	Associate	06/29/23	0.6	\$685.00	\$411.00	Sanctions Judgment: analyze updated research memorandum from P. Chang-Sundin (summer associate) regarding foreclosure against an LP interest and determine next steps regarding the same.
McHugh, Brendan P.	Associate	06/29/23	0.7	\$685.00	\$479.50	Sanctions Judgment: draft and edit subpoenas to PNC and Bank of America.
McHugh, Brendan P.	Associate	06/30/23	0.3	\$685.00	\$205.50	Sanctions Judgment: correspondence with J. Argentina regarding subpoenas to PNC and Bank of America and required notices for the same.
Rank, Robin E.	Paralegal	06/30/23	0.2	\$440.00	\$88.00	Attention to Sheriff's Service information; update service and interrogatory response deadline in spreadsheet and calendar response deadline.
Rank, Robin E.	Paralegal	06/09/23	0.1		\$0.00	Communications regarding Delaware Sheriff's service and Montgomery County court
Rank, Robin E.	Paralegal	06/29/23	0.1		\$0.00	Prepare Goldman Sachs Bank, USA writ package.
McHugh, Brendan P.	Associate	07/05/23	0.4	\$685.00	\$274.00	Sanctions Judgment: Correspondence with A. Morale (counsel for UBS Financial Services, Inc.) regarding discovery served upon UBS.
McHugh, Brendan P.	Associate	07/05/23	1.0	\$685.00	\$685.00	Sanctions Judgment: Correspondence with J. Argentina regarding next steps for discovery (.3); meeting with J. Argentina regarding strategy and next steps related to the same (.4); analyze strategy and next steps in preparation for the same (.3).
McHugh, Brendan P.	Associate	07/05/23	1.2	\$685.00	\$822.00	Sanctions Judgment: Continue to draft and edit subpoenas to Bank of America, N.A., and PNC Bank, N.A.
McHugh, Brendan P.	Associate	07/05/23	0.3	\$685.00	\$205.50	Sanctions Judgment: Review and analyze e-mail from T. Frederick (counsel for Bank of America) regarding discovery served upon it.
Argentina, Joseph	Counsel	07/05/23	0.8	\$745.00	\$596.00	Sanctions Judgment: review correspondence from UBS counsel regarding bank discovery and related direction to B. McHugh (.4); confer with B. McHugh re: motion to compel discovery from McGuckin and other collection issues (.4).
McHugh, Brendan P.	Associate	07/06/23	0.6	\$685.00	\$411.00	Sanctions Judgment: Analyze and edit subpoena to Bank of America, N.A. in response to comments from J. Argentina.

McHugh, Brendan P.	Associate	07/06/23	0.3	\$685.00	\$205.50	Sanctions Judgment: Conference call with Montgomery County prothonotary's office regarding subpoenas for documents.
McHugh, Brendan P.	Associate	07/06/23	1.7	\$685.00	\$1,164.50	Sanctions Judgment: Review and analyze authority cited by T. Frederick (counsel for Bank of America) regarding confidentiality of financial records (1.4); e-mail correspondence with J. Argentina regarding the same (.3).
Argentina, Joseph	Counsel	07/06/23	0.9	\$745.00	\$670.50	Sanctions Judgment: review and revise subpoena to BofA and related documents (.7); related email to B. McHugh (.2).
Argentina, Joseph	Counsel	07/06/23	0.2	\$745.00	\$149.00	Sanctions Judgment: Telephone conference with W. Gardner re: bank subpoenas
Argentina, Joseph	Counsel	07/06/23	0.6	\$745.00	\$447.00	Sanctions Judgment: review and analyze email analysis from counsel to BofA, draft short reply email, draft initial analysis and assign follow up work to B. McHugh
Argentina, Joseph	Counsel	07/07/23	1.0	\$745.00	\$745.00	Sanctions Judgment: review analysis of BofA issues by B. McHugh (.2); confer with B. McHugh regarding bank subpoenas (.8)
McHugh, Brendan P.	Associate	07/07/23	3.3	\$685.00	\$2,260.50	Meeting with J. Argentina regarding discovery from bank-related garnishees and prepare for the same (.8); finalize subpoenas to Bank of America, N.A., UBS Financial Services, Inc., and PNC Bank, N.A. (1.7); confer with K. Krimm regarding the same (.3); correspondence with A. Morales (counsel for UBS) regarding the same (.3); correspondence with D. Heim (counsel for McGuckin and PVI) providing the notice required by the Pennsylvania Rules of
McHugh, Brendan P.	Associate	07/10/23	0.3	\$685.00	\$205.50	Sanctions Judgment: Correspondence with J. Argentina regarding next steps surrounding subpoena to UBS Financial Services, Inc.
McHugh, Brendan P.	Associate	07/10/23	2.0	\$685.00	\$1,370.00	Sanctions Judgment: Draft and edit certificates of pre-requisite for subpoenas to Bank of America, PNC Bank, and UBS Financial Services (1.0); research and analyze Pennsylvania Rules of Civil Procedure regarding the same (1.0).
McHugh, Brendan P.	Associate	07/12/23	1.6	\$685.00	\$1,096.00	Sanctions Judgment: Correspondence with A. Morales (counsel for UBS) regarding discovery from UBS (.4); correspondence with J. Argentina regarding hearing on Garnder's motion to compel production and responses from McGuckin on July 13, 2023 (.3); analyze interrogatory responses from Goldman Sachs (.6) and correspondence from David Heim regarding the same (.3)
Coe, Richard E.	Partner	07/12/23	0.5	\$865.00	\$432.50	Conference with J. Argentina re: collection actions.
Argentina, Joseph	Counsel	07/12/23	3.0	\$745.00	\$2,235.00	Sanctions Judgment: Review and analyze Goldman responses to interrogatories (.6); E-mail correspondence with counsel to Goldman and McGuckin regarding responses to interrogatories (.7); telephone conferences with client and counsel to McGuckin regarding same (1.3); confer with R. Coe re: same (.4).
Coe, Richard E.	Partner	07/13/23	0.5	\$865.00	\$432.50	Conference with J. Argentina re: discovery hearing and Goldman Sachs lien on McGuckin
Argentina, Joseph	Counsel	07/13/23	0.7	\$745.00	\$521.50	Sanctions Judgment: E-mail correspondence with counsel to Goldman regarding writ (.3); analysis and legal research regarding release of marital account from writ (.4).
Argentina, Joseph	Counsel	07/13/23	0.2	\$745.00	\$149.00	Initial review of Trustee application to employ accountant
McHugh, Brendan P.	Associate	07/13/23	0.6	\$685.00	\$411.00	Analyze strategy and next steps with respect to a subpoena to Goldman Sachs.
Coe, Richard E.	Partner	07/14/23	1.1	\$865.00	\$951.50	Review praecipe and Goldman answers to interrogatories; exchange emails re: same and coordinate filing of same.
McHugh, Brendan P.	Associate	07/14/23	3.0	\$685.00	\$2,055.00	Sanctions Judgment: Analyze strategy and next steps regarding writ of execution to Goldman Sachs (1.3); edit praecipe for discontinuance regarding the same (.4); detailed correspondence with R. Coe, J. Argentina, and R. Rank regarding the same (1.3)
Rank, Robin E.	Paralegal	07/14/23	1.0	\$440.00	\$440.00	Communications with J. Argentina regarding discovery responses from Goldman Sachs & Co; communications with team regarding e-filing Praecipe for Discontinuance; edit, upload and e-file Praecipe for Discontinuance of Garnishee (Goldman Sachs & Co.); attention to file organization: check Philadelphia County Court docket to confirm whether defendant

Argentina, Joseph	Counsel	07/14/23	2.4	\$745.00	\$1,788.00	Sanctions Judgment: multiple email correspondence responding to counsel to McGuckin's threats for emergency litigation to release Goldman funds from garnishment
Rank, Robin E.	Paralegal	07/17/23	0.2	\$440.00	\$88.00	Review communications from court accepting 7/14/2023 e-filing; file communications into file; notify team of court's acceptance
McHugh, Brendan P.	Associate	07/17/23	3.3	\$685.00	\$2,260.50	Sanctions Judgment: Meeting with J. Argentina regarding strategy and next steps (.5); draft and edit subpoena for documents issued to Goldman Sachs (1.3); analyze procedures and rules governing the same in Philadelphia Court of Common Pleas (.7); correspondence with J. Argentina regarding the same (.3); finalize praecipe for entry of appearance for collections action pending in Philadelphia County (.3); correspondence with R. Rank
Argentina, Joseph	Counsel	07/17/23	0.4	\$745.00	\$298.00	Sanctions Judgment: conferences with B. McHugh re: discovery to Goldman issues
McHugh, Brendan P.	Associate	07/18/23	2.0	\$685.00	\$1,370.00	Sanctions Judgment: Attention to entry of appearance on Philadelphia County docket (.2); finalize notice of intent to serve subpoena upon Goldman Sachs (.7); finalize subpoena to Goldman Sachs in connection with the same (.4); finalize and send cover letter to D. Heim enclosing the same (.4); correspondence with K. Krimm regarding the same (.1); correspondence with counsel for Goldman confirming their authorization to accept service of subpoena once issued (.2)
Rank, Robin E.	Paralegal	07/18/23	1.5	\$440.00	\$660.00	Communications with B. McHugh regarding file and service of Notice of Appearance; upload and file Notice of Appearance of Brendan McHugh to Philadelphia County Court; prepare and serve Notice of Appearance on opposing counsel; communications with court regarding filing; upload and refile Notice of Appearance; communications with Sheriff's office regarding details for ad: communications with J. Argentina and B. McHugh regarding
McHugh, Brendan P.	Associate	07/18/23	1.0	\$685.00	\$685.00	Sanctions Judgment: Analyze advertising requirements for sheriff's sale prompted by inquiry from the Sheriff's department (.5); confer with R. Rank regarding the same (.2); correspondence with J. Argentina and R. Rank regarding next steps regarding the same
Argentina, Joseph	Counsel	07/18/23	0.3	\$745.00	\$223.50	Sanctions Judgment: E-mail correspondence with B. McHugh and R. Rank regarding advertisement for Sheriff sale of McGuckin property
McHugh, Brendan P.	Associate	07/19/23	0.8	\$685.00	\$548.00	Sanctions Judgment: Analyze strategy and next steps related to enforcement against McGuckin's real property.
McHugh, Brendan P.	Associate	07/20/23	2.3	\$685.00	\$1,575.50	Sanctions Judgment: Analyze rules and strategy regarding service of notice of real estate sale upon possible interest holders (1.3); detailed e-mail to J. Argentina regarding the
Coe, Richard E.	Partner	07/20/23	0.2	\$865.00	\$173.00	Review edits from J. Argentina to motion to dismiss.
McHugh, Brendan P.	Associate	07/21/23	0.6	\$685.00	\$411.00	Sanctions Judgment: Analyze strategy and next steps regarding collection against real property owned by McGuckin.
McHugh, Brendan P.	Associate	07/21/23	0.3	\$685.00	\$205.50	Sanctions Judgment: Draft certificate of pre-requisite to service of subpoena to Goldman as required by Pa.R.Civ.P.
McHugh, Brendan P.	Associate	07/24/23	1.4	\$685.00	\$959.00	Sanctions Judgment: Strategy meeting with J. Argentina regarding next steps surrounding sale of McGuckin's real property, bank-related subpoenas, and next steps surrounding writs previously issued and served.
McHugh, Brendan P.	Associate	07/24/23	0.5	\$685.00	\$342.50	Sanctions Judgment: Analyze strategy and next steps related to service of subpoena for documents and things.
McHugh, Brendan P.	Associate	07/24/23	0.8	\$685.00	\$548.00	Sanctions Judgment: Conference call with G. Clarke at the Delaware County Sheriff's Office regarding process for Sheriff's sale of real property; follow-up correspondence with J. Argentina regarding the same (.4); analyze notice requirements for sheriff's sale in connection with the same (.4)
Argentina, Joseph	Counsel	07/24/23	2.5	\$745.00	\$1,862.50	Sanctions Judgment: analyze notice requirements for potential interest holders in McGuckin real property (1.1); confer with B. McHugh re: same (1.4).

McHugh, Brendan P.	Associate	07/25/23	1.6	\$685.00	\$1,096.00	Sanctions Judgment: Draft and edit cover letter serving notice of sheriff's sale of real property upon those listed in Rule 3129.1 affidavit as required by Pennsylvania Rules (.8); correspondence with J. Argentina regarding the strategy for the same (.2); correspondence with R. Rank regarding requirements surrounding the same (.4) and analyze statutory requirements for the same (.2)
McHugh, Brendan P.	Associate	07/25/23	2.3	\$685.00	\$1,575.50	Sanctions Judgment: Research regarding default judgment against a garnishee for failure to answer interrogatories (1.6); detailed correspondence with J. Argentina regarding the
Rank, Robin E.	Paralegal	07/25/23	1.2	\$440.00	\$528.00	Communications with B. McHugh regarding service of Notice of Sheriff's Sale; communications with Philadelphia Office Services regarding same; prepare instructions and documents, send to Office Services for printing and mailing; review and save pdfs of envelopes and form 3718 for attachments to affidavit
Argentina, Joseph	Counsel	07/25/23	0.6	\$745.00	\$447.00	Sanctions Judgment: review and revise letter to potential interest holders in McGuckin property (.4); confer with B. McHugh re: same (.2)
McHugh, Brendan P.	Associate	07/26/23	1.3	\$685.00	\$890.50	Sanctions Judgment: Finalize certificates of prerequisite to service of subpoenas upon Bank of America, UBS, and PNC Banks (.5); analyze Pennsylvania Rules of Civil Procedure in connection with the same (.4); draft and edit cover letter to counsel for UBS in connection with forthcoming service of the same (.4).
McHugh, Brendan P.	Associate	07/26/23	0.4	\$685.00	\$274.00	Sanctions Judgment: Continue to analyze default procedures for a garnishee's failure to respond to interrogatories in attachment.
McHugh, Brendan P.	Associate	07/27/23	2.8	\$685.00	\$1,918.00	Sanctions Judgment: Analyze McGuckin's objections to subpoenas to Bank of America, UBS, and PNC and evaluate next steps (1.3); e-mail correspondence with J. Argentina and R. Rank regarding the same (.2); research and analyze case law refuting McGuckin's argument that third-party subpoenas are procedurally improper under the Pennsylvania Rules of Civil Procedure (1.3)
Argentina, Joseph	Counsel	07/27/23	1.8	\$745.00	\$1,341.00	Sanctions Judgment: review and analyze McGuckin objections to bank subpoenas and begin research on motion to enforce
McHugh, Brendan P.	Associate	07/28/23	0.2	\$685.00	\$137.00	Sanctions Judgment: Strategy call with J. Argentina.
McHugh, Brendan P.	Associate	07/28/23	2.1	\$685.00	\$1,438.50	Sanctions Judgment: Draft and edit affidavit pursuant to Rule 3129.2 (related to sheriff's sale of real estate) (1.3); analyze exhibits required to be appended to the same under the rules (.5); correspondence with R. Rank regarding the same (.3).
Rank, Robin E.	Paralegal	07/28/23	0.5	\$440.00	\$220.00	Communications with B. McHugh regarding certificate of mailings; organize and file same into record; communications with B. McHugh regarding obtaining a file stamped copy J. Argentina Affidavit filed May 24, 2023; review court's efile and docket websites to obtain stamped file copy of affidavit; telephone call to court regarding same
Argentina, Joseph	Counsel	07/28/23	5.1	\$745.00	\$3,799.50	Sanctions Judgment: analyze objections to subpoenas and begin draft of motion to overrule objections (3.3); email correspondence with client regarding subpoena objections, order granting motion to compel, recommended next steps (.6); review and revise writ package to garnish Rex distributions (.3); legal research and analysis regarding effect of McGuckin bankruptcy (.9)
Rank, Robin E.	Paralegal	07/30/23	0.5	\$440.00	\$220.00	Communications with J. Argentina regarding updating interest through July 31, 2023; calculate updated interest and revise writ documents, return to J. Argentina for review
McHugh, Brendan P.	Associate	07/31/23	0.7	\$685.00	\$479.50	Sanctions Judgment: Strategy meeting with J. Argentina regarding collections efforts.
McHugh, Brendan P.	Associate	07/31/23	0.5	\$685.00	\$342.50	Sanctions Judgment: Continue to draft and edit affidavit pursuant to Rule 3129.2 (related to sheriff's sale of real estate).
Argentina, Joseph	Counsel	07/31/23	1.0	\$745.00	\$745.00	Sanctions Judgment: confer with B. McHugh re: Rex garnishment issues (.7); review and execute Rex garnishment praecipe (.3)

McHugh, Brendan P.	Associate	08/01/23	0.7	\$685.00	\$479.50	Sanctions Judgment: Continue to draft and edit affidavit pursuant to Rule 3129.2 (related to sheriff's sale of real estate) (.4); e-mail correspondence with Mr. Joe Argentina regarding the same (.3).
McHugh, Brendan P.	Associate	08/01/23	1.1	\$685.00	\$753.50	Sanctions Judgment: Research case law and analyze strategy with respect to a writ of garnishment issued to Rex LP.
McHugh, Brendan P.	Associate	08/02/23	0.5	\$685.00	\$342.50	Sanctions Judgment: Finalize affidavit pursuant to Rule 3129.2 (related to sheriff's sale of real estate) and exhibits to the same.
Argentina, Joseph	Counsel	08/02/23	0.4	\$745.00	\$298.00	Sanctions Judgment: review affidavit and confirm that appropriate notice of McGuckin foreclosure sale was given to third parties and related exhibits
McHugh, Brendan P.	Associate	08/03/23	1.2	\$685.00	\$822.00	Sanctions Judgment: Meeting with Mr. Joe Argentina regarding strategy and next steps for collection efforts (.7); follow-up research regarding real property sale from the same (.5).
Argentina, Joseph	Counsel	08/03/23	1.9	\$745.00	\$1,415.50	Sanctions Judgment: review B. McHugh analysis of process to obtain judgments against McGuckin entities/garnishees (.8); analyze strategic considerations of actions against garnishees (.8); confer with B. McHugh re: same (.3).
Argentina, Joseph	Counsel	08/03/23	5.3	\$745.00	\$3,948.50	Sanctions Judgment: analyze potential effects of McGuckin personal bankruptcy on collection efforts, related legal research on lien avoidance, insider status, effect of Gardner claim being found non-dischargeable (4.8); confer with T. Casey re: same (.5).
McHugh, Brendan P.	Associate	08/04/23	3.8	\$685.00	\$2,603.00	Sanctions Judgment: Analyze e-mail correspondence from Mr. Joe Argentina regarding collections efforts (.2); meeting with Mr. Joe Argentina regarding real property sale and other collections efforts (.7); edit master list of collection-related efforts with status and deadlines for the same (.4); correspondence with Ms. Robin Rank regarding garnishment writ to Goldman Sachs Bank (.3); analyze status of garnishment writ to Metro Physicians Specialty Group, P.C. and analyze Pennsylvania Rules of Civil Procedure for re-issuance of the same (.8); detailed correspondence with Mr. Joe Argentina and Ms. Robin Rank regarding the same (.4); analyze procedures, process, and other sale-related requirements for sheriff's sale of real property in Delaware County (4.9).
Rank, Robin E.	Paralegal	08/04/23	0.8	\$440.00	\$352.00	Review court websites for additional sheriff services; update tracking spreadsheet; communications with B. McHugh regarding whether we need to serve Goldman Sachs Bank documents
Argentina, Joseph	Counsel	08/04/23	4.1	\$745.00	\$3,054.50	Sanctions judgment: draft analysis and recommended next steps to client re: all active collection issues (2.6); confer with B. McHugh re: foreclosure sale diligence (.7); review and revise spreadsheet of execution efforts and assign revisions to B. McHugh and R. Rank
McHugh, Brendan P.	Associate	08/07/23	2.0	\$685.00	\$1,370.00	Sanctions Judgment: Analyze strategy and next steps regarding garnishment writs; detailed e-mail correspondence with Mr. Joe Argentina and Ms. Robin Rank regarding the
Rank, Robin E.	Paralegal	08/07/23	0.6	\$440.00	\$264.00	Communications with B. McHugh regarding Bucks County Service; review file and email communications with Bucks County Sheriff and update B. McHugh
McHugh, Brendan P.	Associate	08/08/23	0.9	\$685.00	\$616.50	Sanctions Judgment: Finalize Affidavit of Service of Notice of Sheriff's Sale and exhibits to the same (.5); detailed e-mail correspondence with Ms. Robin Rank regarding filing and service of the same (.4).
McHugh, Brendan P.	Associate	08/08/23	5.2	\$685.00	\$3,562.00	Sanctions Judgment: Research and analyze procedural requirements and practical guidance for bidding at sheriff's sale of McGuckin's real property in Delaware County, which is currently scheduled for September 15th (2.4); research and analyze ability of a judgment creditor to "credit bid" at the same (.8); research and analyze requirements and practical effect of 42 Pa.C.S. Section 8103 (Deficiency Judgment Act) when an executing creditor purchases property at a sheriff's sale (2.0)
McHugh, Brendan P.	Associate	08/08/23	0.8	\$685.00	\$548.00	Sanctions Judgment: Analyze strategy regarding subpoena to Goldman Sachs & Co. (.4); e-mail correspondence with Mr. Joe Argentina regarding recommendation related to the

Rank, Robin E.	Paralegal	08/08/23	1.0	\$440.00	\$440.00	Prepare and efile affidavit of service and exhibits; prepare and service of same on opposing counsel; telephone call with Delaware County Sheriff's office regarding same; prepare and mail same to Delaware County Sheriff's Office
McHugh, Brendan P.	Associate	08/09/23	4.9	\$685.00	\$3,356.50	Sanctions Judgment: Continue to research and analyze procedural requirements and practical guidance for bidding at sheriff's sale of McGuckin's real property in Delaware County, which is currently scheduled for September 15th (3.4); research and analyze ability of a judgment creditor to "credit bid" at the same (1.1); conference calls with the Sheriff's Office regarding the same (4)
Rank, Robin E.	Paralegal	08/10/23	0.5	\$440.00	\$220.00	Communications with B. McHugh regarding publication of sheriff's sale; communications with Delaware County Sheriff's office to confirm which publications the sale will be noticed in; communications with Northampton Sheriff's office regarding service of writ that was filed June 7, 2023 and delivered to their office: update tracking spreadsheet
McHugh, Brendan P.	Associate	08/10/23	4.8	\$685.00	\$3,288.00	Sanctions Judgment: Continue to research and analyze procedural requirements and practical guidance for bidding at sheriff's sale of McGuckin's real property in Delaware County, which is currently scheduled for September 15th (2.2); research and analyze the ability of judgment creditor to independently market property subject to sheriff's sale (1.4); analyze procedural requirements of Pennsylvania's Deficiency Judgment Act to advise Mr. Gardner about risks of bidding at real property sale (1.2)
McHugh, Brendan P.	Associate	08/11/23	2.4	\$685.00	\$1,644.00	Sanctions Judgment: Continue to research and analyze procedural requirements and practical guidance for bidding at sheriff's sale of McGuckin's real property in Delaware County, which is currently scheduled for September 15th (1.2); detailed e-mail correspondence with Mr. Joe Argentina regarding the same and strategy for the same
Argentina, Joseph	Counsel	08/14/23	0.3	\$745.00	\$223.50	Sanctions Judgment: review service returns filed by Montgomery County Prothonotary
McHugh, Brendan P.	Associate	08/16/23	0.2	\$685.00	\$137.00	Sanctions Judgment: Analyze returns filed by the prothonotary's office in the Montgomery County action.
McHugh, Brendan P.	Associate	08/17/23	0.3	\$685.00	\$205.50	Sanctions Judgment: Analyze filings by Bochetto and Lentz in the Delaware County action (.2); correspondence with Mr. Joe Argentina regarding discovery order entered in the Montgomery County action (.1).
Argentina, Joseph	Counsel	08/17/23	0.6	\$745.00	\$447.00	Sanctions Judgment: call with client regarding status of collection matters
McHugh, Brendan P.	Associate	08/21/23	5.4	\$685.00	\$3,699.00	Sanctions Judgment: Analyze emergency petition to intervene and set aside September sheriff's sale filed by Alison McGuckin (1.4); analyze process for responding and hearing for the same (.7); meeting with Mr. Joe Argentina regarding strategy and next steps regarding the same (.9); research and analyze arguments for response to the same (2.4)
Argentina, Joseph	Counsel	08/21/23	2.3	\$745.00	\$1,713.50	Sanctions Judgment: review petition to intervene by Alison McGuckin in Delaware County action (.6); legal research and analysis of issues raised by Mrs. McGuckin (1.8); confer with B. McHugh on procedural and substantive response issues to petition (.9).
McHugh, Brendan P.	Associate	08/22/23	7.9	\$685.00	\$5,411.50	Sanctions Judgment: Research and analyze case law and authority to oppose Alison McGuckin's petition to intervene and stay sheriff's sale (5.5); draft detailed analysis of the
Argentina, Joseph	Counsel	08/22/23	1.3	\$745.00	\$968.50	Sanctions Judgment: further review of McGuckin petition to intervene and related brief legal research on marital property and tenants in the entirety
McHugh, Brendan P.	Associate	08/23/23	5.8	\$685.00	\$3,973.00	Sanctions Judgment: Research and analyze case law regarding marital property, property held as tenants by the entirety, and the distinction between the same (2.4); draft detailed analysis of the same and e-mail correspondence with Mr. Joe Argentina regarding the same (.8); analyze various filings made by Alison McGuckin in the Delaware County action, including new emergency petition to intervene (.8); meeting with Joe Argentina regarding the same and strategy for the same (1.5); analyze procedural rules related to emergency petitions in Delaware County (.2)

Argentina, Joseph	Counsel	08/23/23	2.0	\$745.00	\$1,490.00	Sanctions Judgment: review McGuckin praecipe to withdraw petition to intervene and new petition to intervene (.7); conferences with B. McHugh re: response to petition (1.3)
McHugh, Brendan P.	Associate	08/24/23	0.5	\$685.00	\$342.50	Sanctions Judgment: Analyze petition to intervene filed by Alison McGuckin (.2); analyze rules of civil procedure related to continued or stayed sheriff's sales (3).
Argentina, Joseph	Counsel	08/24/23	3.7	\$745.00	\$2,756.50	Sanctions Judgment: legal research and drafting for response to Alison McGuckin petition to intervene.
McHugh, Brendan P.	Associate	08/25/23	5.8	\$685.00	\$3,973.00	Sanctions Judgment: Meeting with Mr. Joe Argentina regarding strategy and next steps related to Alison McGuckin's petition to intervene (.9); research and analyze procedural issues with Emergency Petition to Intervene filed by Ms. Alison McGuckin and case law related to the same (2.6); analyze Delaware County docket in connection with the same (.4); detailed correspondence with Mr. Joe Argentina regarding procedural research (.4); research and analyze whether the definition of marital property in the divorce code confers a property interest on one spouse in property owned by the other prior to divorce
Argentina, Joseph	Counsel	08/25/23	2.0	\$745.00	\$1,490.00	Sanctions Judgment: revise answer to Alison McGuckin petition to intervene (1.3); conferences with B. McHugh re: same (.7)
McHugh, Brendan P.	Associate	08/27/23	0.8	\$685.00	\$548.00	Sanctions Judgment: Research and analyze whether the definition of marital property in the divorce code confers a property interest on one spouse in property owned by the other prior to divorce proceedings (.4); correspondence with Mr. Joe Argentina regarding
McHugh, Brendan P.	Associate	08/27/23	1.3	\$685.00	\$890.50	Sanctions Judgment: Analyze secondary source materials regarding standards for intervention under the Pennsylvania Rules; further research and analyze procedural issues with Emergency Petition to Intervene filed by Ms. Alison McGuckin and case law related to
McHugh, Brendan P.	Associate	08/28/23	6.4	\$685.00	\$4,384.00	Sanctions Judgment: Meetings with Mr. Joe Argentina regarding strategy and next steps related to sheriff's sale of real property in the Delaware County action (2.3); analyze return of service filed by the Delaware County Sheriff's office indicating that McGuckin and PVI were not served by the Sheriff's office with the writ of execution or notice of real property sale (.4); research and analyze rules of civil procedure to determine next steps surrounding the same (2.2); detailed e-mail correspondence with Mr. Joe Argentina regarding the same (.9); analyze order entered by Judge Kelly Eckel permitting intervention by Ms. Alison McGuckin and granting leave for her to file petitions to stay the Sheriff's sale and/or set aside the writ (.3); analyze returns entered on the Montgomery
Argentina, Joseph	Counsel	08/28/23	3.8	\$745.00	\$2,831.00	Sanctions Judgment: extensive review and analysis of PA rules on service of notice of foreclosure sale on real property and related conferences with B. McHugh (3.3); confer with client re: same (.3); review sheriff's return of service filing (.2).
Argentina, Joseph	Counsel	08/28/23	1.5	\$745.00	\$1,117.50	Sanctions Judgment: revise objection to petition to intervene (.3); begin draft of brief in support of objection to petition to intervene (.7); review order on petition to intervene (.1); confer with B. McHugh re: effect of order and next steps (.4).
Argentina, Joseph	Counsel	08/28/23	0.2	\$745.00	\$149.00	Sanctions Judgment: review docket in Montgomery county case and recent filings
McHugh, Brendan P.	Associate	08/29/23	5.5	\$685.00	\$3,767.50	Sanctions Judgment: Research and analyze procedural issues and solutions related to sheriff's sale on September 15th (2.5); conference call with Delaware County Sheriff's office regarding the same (.2); draft and edit notice of continued sale required under the rules (.7); detailed correspondence with Mr. Joe Argentina regarding the same (.4); draft letter serving the same upon the Delaware County Sheriff's Office (.5); draft letter serving notice of sale and notice of continued sale to David Heim (counsel for McGuckin and PVI) (.7); and meeting with Mr. Joe Argentina regarding strategy and next steps (.5)
Argentina, Joseph	Counsel	08/29/23	4.7	\$745.00	\$3,501.50	Sanctions Judgment: continue research and drafting for response to petition to set aside writ of execution

Argentina, Joseph	Counsel	08/29/23	0.8	\$745.00	\$596.00	Sanctions Judgment: analyze rules on service of sale notice for McGuckin real property and related conference with B. McHugh
Rank, Robin E.	Paralegal	08/30/23	1.0	\$440.00	\$440.00	Communications with B. McHugh regarding filing Notice of Continued Sheriff's Sale and Certificate of Filing and affidavit of service; efile notice and accompanying documents; prepare instructions for mailing and send to office services for first class mailing
McHugh, Brendan P.	Associate	08/30/23	4.5	\$685.00	\$3,082.50	Sanctions Judgment: Finalize filings related to continuance of September 15th sheriff's sale and analyze certain procedural issues related to service of the same (1.8); meeting with Mr. Joe Argentina regarding the same (.2); call to Delaware County Sheriff's Office regarding their requirements for the same (.2); meeting and correspondence with Ms. Robin Rank regarding filing of the same (.4); finalize letter serving notice of sale and notice of continued sale to David Heim (counsel for McGuckin and PVI) (.7); finalize letter serving notice of continued sale to Delaware County Sheriff's Office (.5); correspondence with Ms. Robin Rank regarding service of the same (.3); e-mail correspondence with Ms. Lori Schreiber (Delaware County Sheriff's Office) regarding the same (.2); e-mail
Argentina, Joseph	Counsel	08/30/23	0.6	\$745.00	\$447.00	Sanctions Judgment: review notice of continuance and related files (.4); E-mail and phone correspondence with B. McHugh re: same (.2)
Argentina, Joseph	Counsel	08/30/23	5.2	\$745.00	\$3,874.00	Sanctions Judgment: legal research and drafting for brief in support of objection to petition to set aside Writ related to McGuckin property
McHugh, Brendan P.	Associate	08/31/23	4.4	\$685.00	\$3,014.00	Sanctions Judgment: Draft and edit Amended Rule 3129.2 Affidavit in connection with real property sale (2.8); analyze Exhibits to be appended to the same (.3); analyze requirements of applicable rules of civil procedure, as well as case law interpreting the same in connection with the same (1.0); correspondence with Mr. Joe Argentina
McHugh, Brendan P.	Associate	08/31/23	3.1	\$685.00	\$2,123.50	Sanctions Judgment: Analyze Emergency Petition to Stay and Set Aside Sheriff's Sale and Associated Writ of Execution filed by Alison McGuckin in the Delaware County action (.7); confer with Mr. Joe Argentina regarding next steps for the same (.4); correspondence with Ms. Kaitlyn Bonsell regarding assistance with responding to the same (.2); research and analyze arguments to oppose the same (1.8)
McHugh, Brendan P.	Associate	08/31/23	0.5	\$685.00	\$342.50	Sanctions Judgment: Analyze notice of hearing form served by Bochetto and Lentz (counsel for Alison McGuckin) regarding hearing on Alison McGuckin's Emergency Petition to Stay and Set Aside the Sheriff's Sale (.1); review and analyze local procedural rules
Argentina, Joseph	Counsel	08/31/23	5.5	\$745.00	\$4,097.50	Sanctions Judgment: review new petition to set aside execution writ for McGuckin property (.5); revise draft of brief in support of opposition to same (4.2); conferences with R. Coe and B. McHugh re: same (.8).
McHugh, Brendan P.	Associate	09/01/23	1.3	\$685.00	\$890.50	Sanctions Judgment: Analyze local rules to determine hearing date for Alison McGuckin's Petition to Stay and Set Aside Sheriff's Sale (.7); conference call with Delaware County Office of Judicial Support (Prothonotary) regarding the same (.3); analyze current Delaware County records for property at 583 County Line Road in connection with answering Alison McGuckin's Petition (.3)
McHugh, Brendan P.	Associate	09/01/23	1.3	\$685.00	\$890.50	Research regarding standard to grant or deny stay of execution.
McHugh, Brendan P.	Associate	09/01/23	0.5	\$685.00	\$342.50	Sanctions Judgment: Edit Answer to Alison McGuckin's Petition to Set Aside Sheriff's Sale and Associated Writ.
Argentina, Joseph	Counsel	09/01/23	3.7	\$745.00	\$2,756.50	Sanctions Judgment: finish first draft of answer to Alison McGuckin's petition to stop sheriff sale and brief in support of the answer
McHugh, Brendan P.	Associate	09/03/23	3.2	\$685.00	\$2,192.00	Sanctions Judgment: Edit Answer to Alison McGuckin's Petition to Set Aside Sheriff's Sale and Associated Writ and edit brief in opposition to the same (3.0); e-mail correspondence with Mr. Richard Coe and Mr. Joe Argentina regarding the same (.2).



Coe, Richard E.	Partner	09/03/23	1.2	\$865.00	\$1,038.00	Review and revise answer to petition to set aside sheriff's sale
McHugh, Brendan P.	Associate	09/04/23	0.4	\$685.00	\$274.00	Sanctions Judgment: Analyze Rick Coe's comments and edits to Petition Response and brief in support thereof.
McHugh, Brendan P.	Associate	09/05/23	1.2	\$685.00	\$822.00	Sanctions Judgment: Analyze correspondence from Mr. Joe Argentina regarding strategy for responding to Alison McGuckin's Petition to Set Aside Sheriff's Sale and Associated Writ and questions related to the same (.4); correspondence with J. Argentina regarding the same (.4); follow-up conference call with Mr. Joe Argentina regarding the same (.4).
McHugh, Brendan P.	Associate	09/05/23	1.5	\$685.00	\$1,027.50	Sanctions Judgment: Revise Amended Rule 3129.2 Affidavit in connection with real property sale (.8); research and analyze strategic considerations for the same (.5); e-mail correspondence with Mr. Joe Argentina regarding the same (.2).
McHugh, Brendan P.	Associate	09/05/23	2.2	\$685.00	\$1,507.00	Sanctions Judgment: Draft proposed order to be filed with Gardner's Answer to Alison McGuckin's Petition to Set Aside Sheriff's Sale and Associated Writ (.7); draft required certifications and verifications in connection with the same (.8); conference call with Delaware County Office of Judicial Support regarding required cover sheet and complete the same (.4); correspondence with Mr. Joe Argentina regarding the same (.3).
McHugh, Brendan P.	Associate	09/05/23	2.5	\$685.00	\$1,712.50	Sanctions Judgment: Review and revise Answer to Alison McGuckin's Petition to Set Aside Sheriff's Sale and Associated Writ and Brief in Support of the Same (2.2); e-mail correspondence with Ms. Kaitlyn Bonsell regarding the same (.3).
Argentina, Joseph	Counsel	09/05/23	6.0	\$745.00	\$4,470.00	Sanctions Judgment: review, analyze, and incorporate proposed edits from B. McHugh and R. Coe to answer to petition to set aside writ and sale of McGuckin real property and related brief and draft additional sections to both documents (4.1); review and analyze potential issues related to service of writ and related email to B. McHugh (.7); additional legal research on possible policy argument in support of object to petition (.8); review draft certificate of service, verification, certificate of compliance with PA public policy.
Ciampitti, Denise A.	Paralegal	09/05/23	0.1	\$385.00	\$38.50	Search Delaware County Tax Assessment Office for 583 County Line Road, Radnor
Coe, Richard E.	Partner	09/05/23	0.2	\$865.00	\$173.00	Review and revise answer to petition to set aside sheriff's sale and send email to J. Argentina re: same
McHugh, Brendan P.	Associate	09/06/23	3.0	\$685.00	\$2,055.00	Sanctions Judgment: Review and revise Answer to Alison McGuckin's Petition to Set Aside Sheriff's Sale and Associated Writ and Brief in Support of the Same (2.3); confer with Ms. Kaitlyn Bonsell regarding the same (.2); analyze edits to the same made by Mr. Richard E.
McHugh, Brendan P.	Associate	09/06/23	1.5	\$685.00	\$1,027.50	Sanctions Judgment: Conference calls with the Delaware County Office of Judicial Support regarding hearing on Alison McGuckin's Petition (.3); analyze strategy and next steps regarding the same (.5); meeting with Mr. Joe Argentina and Mr. Richard Coe regarding
Argentina, Joseph	Counsel	09/06/23	2.2	\$745.00	\$1,639.00	Sanctions Judgment: draft detailed email analyses to client regarding answer to petition to set aside writ and stay sheriff sale and related issues
Argentina, Joseph	Counsel	09/06/23	0.5	\$745.00	\$372.50	Sanctions Judgment: review proposed edits to brief and answer from B. McHugh (.3); review edits to drafts from K. Bonsell (.2).
Argentina, Joseph	Counsel	09/06/23	0.7	\$745.00	\$521.50	Sanctions Judgment: video conference with R. Coe and B. McHugh regarding petition to set aside writ and stay sheriff sale
Argentina, Joseph	Counsel	09/06/23	0.3	\$745.00	\$223.50	Sanctions Judgment: review cover sheet to answer to petition and related email to B. McHugh (.2); email to B. McHugh re: supporting documents (.1).
McHugh, Brendan P.	Associate	09/06/23	1.2	\$685.00	\$822.00	Sanctions Judgment: Research case law regarding service of a writ of execution for real property and develop strategy for next steps surrounding the same.
Coe, Richard E.	Partner	09/06/23	0.6	\$865.00	\$519.00	Conference with J. Argentina and B. McHugh re: hearing strategy and opposition papers
Coe, Richard E.	Partner	09/06/23	1.1	\$865.00	\$951.50	Review and revise answer to petition to set aside sheriff's sale and brief in support
Bonsell, Kaitlyn E.		09/06/23	3.9	\$375.00	\$1,462.50	Revise Answer to Emergency Petition to set aside writ and brief in support thereof.

McHugh, Brendan P.	Associate	09/07/23	1.6	\$685.00	\$1,096.00	Sanctions Judgment: Correspondence with Mr. Joe Argentina and Mr. Richard Coe regarding the hearing on Alison McGuckin's Petition to Set Aside the Sheriff's Sale and associated writ (.3); analyze Mr. Gardner's edits to the response and brief opposing the same (.3); analyze case law cited in the same in preparation for oral argument (1.0).
Argentina, Joseph	Counsel	09/07/23	0.4	\$745.00	\$298.00	Sanctions Judgment: phone calls with Delaware County prothonotary re: scheduling on McGuckin petition to set aside writ
Argentina, Joseph	Counsel	09/07/23	3.2	\$745.00	\$2,384.00	Sanctions Judgment: revisions to answer to McGuckin petition on writ and accompanying
McHugh, Brendan P.	Associate	09/08/23	1.8	\$685.00	\$1,233.00	Sanctions Judgment: Correspondence with Mr. Joe Argentina and Mr. Richard Coe regarding anticipated October 10th hearing for Alison McGuckin's Petition to Set Aside Sheriff's Sale and associated writ (.3); analyze local rules and Pennsylvania Rules of Civil Procedure to evaluate strategy for filing response prior to the same and correspondence with Mr. Joe Argentina and Richard Coe regarding such analysis (.8); review and edit proposed order to be filed with such response (.7)
McHugh, Brendan P.	Associate	09/11/23	0.7	\$685.00	\$479.50	Sanctions Judgment: Meeting with Mr. Joe Argentina regarding answer to Alison McGuckin's emergency petition in the Delaware County Action and discovery in the Montgomery County Action; Prepare for the same.
McHugh, Brendan P.	Associate	09/11/23	3.3	\$685.00	\$2,260.50	Sanctions Judgment: Research and analyze case law regarding the purchase of real property using funds from a bank account held jointly by husband and wife.
McHugh, Brendan P.	Associate	09/11/23	1.9	\$685.00	\$1,301.50	Sanctions Judgment: Review and revise updated Answer to Alison McGuckin's Petition to Set Aside Sheriff's Sale and Associated Writ and Brief in Support of the Same.
Argentina, Joseph	Counsel	09/11/23	3.4	\$745.00	\$2,533.00	Sanctions Judgment: further edits to answer to petition and brief in support of same (2.8); confer with B. McHugh re: same (.4); review notice of hearing date on Petition (.1); E-mail correspondence with Petitioner counsel re: hearing notice (.1)
McHugh, Brendan P.	Associate	09/12/23	1.7	\$685.00	\$1,164.50	Sanctions Judgment: Review and revise updated Answer to Alison McGuckin's Petition to Set Aside Sheriff's Sale and Associated Writ and Brief in Support of the Same (1.5); edit proposed order to be filed with the same (.2).
McHugh, Brendan P.	Associate	09/12/23	0.9	\$685.00	\$616.50	Sanctions Judgment: Meeting with Mr. Joe Argentina regarding next steps for discovery in the Montgomery County Action and regarding strategy and next steps related to the October 15th Sheriff's Sale in Delaware County.
McHugh, Brendan P.	Associate	09/12/23	0.3	\$685.00	\$205.50	Sanctions Judgment: E-mail correspondence with Lori Schreiber (Delaware County Sheriff's Office) regarding continuance of September 15th sale of real property.
McHugh, Brendan P.	Associate	09/12/23	0.8	\$685.00	\$548.00	Sanctions Judgment: Analyze strategy surrounding a possible Motion for Sanctions in the Montgomery County Action for McGuckin's failure to comply with the Discovery Order entered in July.
Argentina, Joseph	Counsel	09/12/23	1.9	\$745.00	\$1,415.50	Sanctions Judgment: revise Answer and Brief in opposition to Petition to set aside writ
McHugh, Brendan P.	Associate	09/13/23	0.5	\$685.00	\$342.50	Sanctions Judgment: Analyze correspondence from Mr. Joe Argentina regarding discovery related issues (.3); analyze strategy and next steps related to the same (.2).
McHugh, Brendan P.	Associate	09/13/23	2.6	\$685.00	\$1,781.00	Sanctions Judgment: Finalize First Amended Rule 3129.2 Affidavit (1.5); correspondence with Ms. Robin Rank regarding filing and service of the same (.5); draft cover letter to the Delaware County Sheriff's Office serving the same (.3); e-mail correspondence with Ms. Lori Schreiber regarding the same (.3).
McHugh, Brendan P.	Associate	09/13/23	0.4	\$685.00	\$274.00	Sanctions Judgment: Analyze argument that Alison McGuckin lacks standing to intervene and correspondence with Mr. Joe Argentina regarding the same.
Rank, Robin E.	Paralegal	09/13/23	1.4	\$440.00	\$616.00	Communications with B. McHugh regarding filing affidavit and certificates of service in Delaware County; prepare and efile same; telephone call with Prothonotary Office to reiect filing so as to refile documents in correct order

Argentina, Joseph	Counsel	09/13/23	0.6	\$745.00	\$447.00	Sanctions Judgment: review and revise amended Rule 3129 affidavit related to service of notice of sheriff sale
Argentina, Joseph	Counsel	09/13/23	0.2	\$745.00	\$149.00	Sanctions Judgment: review revised proposed order denying petition to set aside writ
McHugh, Brendan P.	Associate	09/14/23	0.8	\$685.00	\$548.00	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina, including preparation for oral argument on Alison McGuckin's Emergency Petition to Set Aside the Sheriff's Sale and Associated Writ.
McHugh, Brendan P.	Associate	09/14/23	1.5	\$685.00	\$1,027.50	Sanctions Judgment: Confirm that September 15th Sheriff's Sale has been listed for continuance by the Sheriff (.2); research regarding whether legal separation confers any ownership interest upon a non-owner spouse (1.3).
McHugh, Brendan P.	Associate	09/14/23	0.5	\$685.00	\$342.50	Sanctions Judgment: Analyze strategy and next steps related to discovery in the Montgomery County Action.
McHugh, Brendan P.	Associate	09/14/23	0.4	\$685.00	\$274.00	Sanctions Judgment: Correspondence with Mr. Joe Argentina regarding Answer to Alison McGuckin's Emergency Petition to Set Aside the Sheriff's Sale and Associated Writ.
McHugh, Brendan P.	Associate	09/14/23	0.4	\$685.00	\$274.00	Sanctions Judgment: Edit Answer to Alison McGuckin's Emergency Petition to Set Aside the Sheriff's Sale and Associated Writ to incorporate edits made by Mr. Gardner.
Rank, Robin E.	Paralegal	09/14/23	0.7	\$440.00	\$308.00	Communications with B. McHugh regarding obtaining court documents; review court docket and pull several pleadings and send to B. McHugh and J. Argentina
Argentina, Joseph	Counsel	09/14/23	1.8	\$745.00	\$1,341.00	Sanctions Judgment: finalize answer to petition, brief, exhibits and other supporting documents (.8); E-mail correspondence with client regarding signed verification (.2); assign table of authorities and contents for brief to paralegal (.1); confer with B. McHugh re: petition, oral argument and related collection matters (.7)
Coe, Richard E.	Partner	09/14/23	0.4	\$865.00	\$346.00	Review revised draft of opposition to foreclosure and send email to J. Argentina re: same
Bonsell, Kaitlyn E.	Paralegal	09/14/23	1.3	\$375.00	\$487.50	Revise Petition to Set Aside Writ.
McHugh, Brendan P.	Associate	09/15/23	2.6	\$685.00	\$1,781.00	Sanctions Judgment: Finalize Answer to Alison McGuckin's Emergency Petition to Set Aside the Sheriff's Sale and Associated Writ and brief in support for the same for filing (2.2); correspondence with Mr. Joe Argentina and Ms. Robin Rank regarding edits to the same (.2); correspondence with Mr. Joe Argentina and Ms. Robin Rank regarding exhibits
Rank, Robin E.	Paralegal	09/15/23	1.4	\$440.00	\$616.00	Review court website for filings; organize documents into file
Argentina, Joseph	Counsel	09/15/23	1.8	\$745.00	\$1,341.00	Sanctions Judgment: finalize Answer to Petition to set aside writ, proposed order, brief, exhibits, verification, certificate of service, and certificate of compliance with Pennsylvania public disclosure rules
Argentina, Joseph	Counsel	09/15/23	0.4	\$745.00	\$298.00	Sanctions Judgment: coordinate filing and service of answer to petition to set aside writ and related documents
McHugh, Brendan P.	Associate	09/19/23	0.6	\$685.00	\$411.00	Sanctions Judgment: analyze outstanding discovery requests to PVI and McGuckin and next steps for the same (.6).
McHugh, Brendan P.	Associate	09/20/23	0.5	\$685.00	\$342.50	Sanctions Judgment: Analyze strategy and next steps for collection and sheriff's sale.
McHugh, Brendan P.	Associate	09/26/23	3.0	\$685.00	\$2,055.00	Sanctions Judgment: Meeting with Mr. Joe Argentina regarding strategy and next steps (.6); research in preparation for October 10, 2023 hearing regarding whether a bond can be requested if Alison McGuckin requests a stay of sale pending appeal of an order denying her petition (2.4).
Argentina, Joseph	Counsel	09/26/23	0.6	\$745.00	\$447.00	Sanctions Judgment: Confer with B. McHugh regarding preparations for October 10 hearing on petition to set aside writ on McGuckin real property
McHugh, Brendan P.	Associate	09/27/23	5.9	\$685.00	\$4,041.50	Sanctions Judgment: Research in preparation for October 10, 2023 hearing regarding whether a bond can be requested if Alison McGuckin requests a stay of sale pending appeal of an order denying her petition.
Coe, Richard E.	Partner	09/27/23	0.8	\$865.00	\$692.00	Conference with B. McHugh re: appeal and stay issues (0.2 hours); conferences with A. Hickok and B. McHugh re: appeal and stay issues and review case forwarded by A. Hickok

Hickok, D. Alicia	Partner	09/27/23	0.3	\$945.00	\$283.50	Call with R. Coe regarding supersedeas and appealability.
McHugh, Brendan P.	Associate	09/28/23	4.3	\$685.00	\$2,945.50	Sanctions Judgment: Research in preparation for October 10, 2023 hearing regarding whether a bond can be requested if Alison McGuckin requests a stay of sale pending appeal of an order denying her petition (2.4); detailed e-mail correspondence with Messrs. Joe Argentina and Rick Coe regarding the same (1.5); follow-up correspondence with Mr. Richard Coe regarding his questions about the same ( .4)
Coe, Richard E.	Partner	09/28/23	0.2	\$865.00	\$173.00	Review research from B. McHugh re: stay pending appeal and exchange emails re: same
McHugh, Brendan P.	Associate	09/29/23	0.8	\$685.00	\$548.00	Sanctions Judgment: Analyze issues and implications should Alison McGuckin appeal following denial of her petition to set aside and stay the sheriff's sale.
Coe, Richard E.	Partner	09/29/23	0.2	\$865.00	\$173.00	Review additional research from B. McHugh re: stay pending appeal and exchange emails re: same
McHugh, Brendan P.	Associate	10/02/23	4.8	\$479.50	\$2,301.60	Sanctions Judgment: Research and analyze whether an order denying intervention is subject to appeal (2.7); research and analyze whether an appeal of such an order stays any
Rank, Robin E.	Paralegal	10/03/23	0.5	\$385.00	\$192.50	Communications with B. McHugh regarding pulling documents from Montgomery County; review and pull various documents from Montgomery County docket; download, organize and save documents to file; send same to B. McHugh
Coe, Richard E.	Partner	10/03/23	0.3	\$757.00	\$227.10	Exchange emails and conference with B. McHugh (0.1 hours) re: McGuckin notice issue
Coe, Richard E.	Partner	10/03/23	0.5	\$757.00	\$378.50	Review research on sanctions and contempt of court and send email to J. Argentina and B. McHugh re: same
McHugh, Brendan P.	Associate	10/03/23	0.4	\$479.50	\$191.80	Sanctions Judgment: Strategy meeting with Mr. J. Argentina regarding argument on Alison McGuckin's Emergency Petition on October 10th.
McHugh, Brendan P.	Associate	10/03/23	2.3	\$479.50	\$1,102.85	Sanctions Judgment: Research and analyze whether an order denying intervention may stay an underlying enforcement action (1.2); detailed e-mail correspondence with Messrs. R. Coe and J. Argentina regarding the same (1.1).
Argentina, Joseph	Counsel	10/04/23	0.3	\$652.00	\$195.60	Sanctions Judgment: Review apparent request for payoff from McGuckin mortgage
Argentina, Joseph	Counsel	10/04/23	2.2	\$652.00	\$1,434.40	Sanctions Judgment: Review B. McHugh's analysis of stay pending appeal issues for petition to set aside writ (.6); Conference with R. Coe and B. McHugh re: hearing on petition to set aside writ and sanctions motion against defendants (1.0); confer with client re: collection issues (.2); E-mail correspondence with counsel to Defendants re: discovery
Coe, Richard E.	Partner	10/04/23	0.9	\$757.00	\$681.30	Conference with J. Argentina and B. McHugh re: hearing preparation and appeal issues
Coe, Richard E.	Partner	10/04/23	0.4	\$757.00	\$302.80	Review additional stay pending appeal research and exchange emails re: same
Coe, Richard E.	Partner	10/04/23	0.2	\$757.00	\$151.40	Exchange emails re: mortgage payoff request
McHugh, Brendan P.	Associate	10/04/23	1.0	\$479.50	\$479.50	Sanctions Judgment: Analyze e-mail and attachments related to a purported loan for which James and Alison McGuckin appear to have applied (.6); detailed e-mail correspondence with Messrs. R. Coe and J. Argentina regarding the same (.4).
Coe, Richard E.	Partner	10/05/23	0.2	\$757.00	\$151.40	Exchange emails re: mortgage request and conference with B. McHugh re: same
Argentina, Joseph	Counsel	10/05/23	0.3	\$652.00	\$195.60	Sanctions Judgment: email to client regarding possible McGuckin mortgage (.1); email to potential mortgagee (.2).
McHugh, Brendan P.	Associate	10/05/23	1.8	\$479.50	\$863.10	Sanctions Judgment: Meeting with Mr. J. Argentina regarding strategy and next steps (.5); further analyze loan-related documents received from a purported lender of Alison and James McGuckin (.4); analyze interest rate in connection with calculating payoff amount in connection with the same (.7); meeting with Mr. R. Coe regarding the same (.2)
Argentina, Joseph	Counsel	10/06/23	1.0	\$652.00	\$652.00	Sanctions Judgment: confer with client re: mortgage issues (.3); email and phone correspondence with McGuckin mortgage company (.3); confer with B. McHugh re: preparation for hearing on petition to set aside writ (.4)

McHugh, Brendan P.	Associate	10/06/23	3.7	\$479.50	\$1,774.15	Sanctions Judgment: Meeting with Mr. J. Argentina to prepare for argument on October 10th about Alison McGuckin's Emergency Petition (.4); review and analyze relevant filings and case law in connection with the same (1.5); analyze Pennsylvania Rules of Evidence to develop strategy to admit certain documents into evidence during the same (1.5); e-mail correspondence with Mr. J. Argentina regarding the same (.3).
Argentina, Joseph	Counsel	10/09/23	5.0	\$652.00	\$3,260.00	Sanctions Judgment: prepare for hearing on petition to set aside writ (review pleadings and key cases; prepare exhibits and argument) (4.4); confer with B. McHugh re: same (.6).
McHugh, Brendan P.	Associate	10/09/23	2.6	\$479.50	\$1,246.70	Sanctions Judgment: Meetings with Mr. J. Argentina in preparation for October 10th argument on Alison McGuckin's Emergency Petition (.6); analyze strategy, case law, and filings in connection with the same (2.0).
Argentina, Joseph	Counsel	10/10/23	1.9	\$652.00	\$1,238.80	Sanctions Judgment: travel to and from hearing on petition to set aside writ
Argentina, Joseph	Counsel	10/10/23	8.2	\$652.00	\$5,346.40	Prepare for hearing on petition set aside writ (review and revise argument) (.9); attend hearing (3.4); post-hearing conferences with B. McHugh, R. Coe, and client (2.4); review and revise draft proposed order (.7); legal research on collateral estoppel (.9).
Coe, Richard E.	Partner	10/10/23	1.5	\$757.00	\$1,135.50	Conference with J. Argentina re: proposed order and arguments against stay pending appeal (1.0 hours); exchange emails re: same (0.2 hours); review and revise proposed
McHugh, Brendan P.	Associate	10/10/23	0.5	\$479.50	\$239.75	Sanctions Judgment: Analyze dockets in actions before Bucks, Monroe, and Northampton Counties related to the Sanctions Judgment (.3); correspondence with Ms. Robin Rank regarding entries of appearance needed in the same (.2).
McHugh, Brendan P.	Associate	10/10/23	1.9	\$479.50	\$911.05	Sanctions Judgment: Research and analyze case law and authority regarding reformation of a deed (1.2); conference call meeting with Mr. J. Argentina regarding the same (.7).
McHugh, Brendan P.	Associate	10/10/23	0.9	\$479.50	\$431.55	Sanctions Judgment: Analyze proposed order prepared by Mr. David Heim per Judge Dozer's instruction and e-mail from Mr. R. Coe regarding the same (.2); conference call meeting with Messrs. J. Argentina and R. Coe regarding the same (.4); follow-up analysis and correspondence with Mr. J. Argentina regarding the same (.3).
Argentina, Joseph	Counsel	10/11/23	0.6	\$652.00	\$391.20	Sanctions Judgment: review and revise draft order scheduling evidentiary hearing on petition to set aside writ (.4); email to counsel to McGuckin re: same (.2).
Argentina, Joseph	Counsel	10/11/23	0.4	\$652.00	\$260.80	Sanctions Judgment: call from tenant in McGuckin carriage house property regarding sheriff sale
Argentina, Joseph	Counsel	10/11/23	3.6	\$652.00	\$2,347.20	Sanctions Judgment: legal research regarding finality of bankruptcy court orders and finality of orders required for collateral estoppel purposes
Coe, Richard E.	Partner	10/11/23	1.2	\$757.00	\$908.40	Review prior research re: mutual mistake and collateral estoppel and send emails to B. McHugh re: same (0.7 hours); conference with A. Hickok re: same (0.3 hours); review and revise proposed order and exchange emails re: same (0.2 hours)
McHugh, Brendan P.	Associate	10/11/23	0.3	\$479.50	\$143.85	Sanctions Judgment: Continue to analyze stipulated order that Judge Dozer directed to be submitted following hearing on Alison McGuckin's Emergency Petition to Stay Sheriff's Sale and Set Aside Associated Writ.
McHugh, Brendan P.	Associate	10/11/23	3.9	\$479.50	\$1,870.05	Sanctions Judgment: Research and analyze case law and authority regarding legal standards for reformation of a deed (3.1); detailed correspondence with Messrs. R. Coe and J. Argentina regarding the same (.8).
Argentina, Joseph	Counsel	10/12/23	0.2	\$652.00	\$130.40	Sanctions Judgment: review email correspondence with Sheriff's office regarding order staying sheriff sale, letter from counsel to McGuckin re: same.
McHugh, Brendan P.	Associate	10/12/23	0.3	\$479.50	\$143.85	Sanctions Judgment: E-mail correspondence with Messrs. J. Argentina and R. Coe regarding stay order (.1); correspondence with Ms. Lori Schreiber regarding the same (.1); follow-up telephone call with Ms. Schreiber regarding the same (.1).

Argentina, Joseph	Counsel	10/13/23	1.3	\$652.00	\$847.60	Sanctions Judgment: phone conference with R. Coe and W. Gardner re: execution issues (hearing on motion to set aside writ; McGuckin mortgage efforts; others) (1,1); confer with R. Coe re: next steps (.2).
Argentina, Joseph	Counsel	10/13/23	0.6	\$652.00	\$391.20	Sanctions Judgment: confer with McGuckin loan company title representative regarding payoff letter (.3); begin draft of payoff letter (.3).
Coe, Richard E.	Partner	10/13/23	0.2	\$757.00	\$151.40	Exchange emails with J. Argentina re: execution issues
Argentina, Joseph	Counsel	10/16/23	1.0	\$652.00	\$652.00	Sanctions Judgment: draft payoff letter to McGuckin mortgage company (.7); confer with Gardner re: same and other issues (.2); email to McGuckin mortgage title company with
McHugh, Brendan P.	Associate	10/16/23	0.4	\$479.50	\$191.80	Sanctions Judgment: Correspondence with Messrs. J. Argentina and R. Coe regarding Order entered on October 11th (.2); correspondence with Ms. Lori Schreiber (Delaware County Sheriff's Office) regarding the same (.2).
Argentina, Joseph	Counsel	10/17/23	0.6	\$652.00	\$391.20	Sanctions Judgment: email and telephone conference with McGuckin mortgage company
Coe, Richard E.	Partner	10/17/23	0.5	\$757.00	\$378.50	Conference with J. Argentina re: McGuckin settlement proposal
Coe, Richard E.	Partner	10/17/23	0.2	\$757.00	\$151.40	Conference with client re: settlement offer
McHugh, Brendan P.	Associate	10/17/23	0.4	\$479.50	\$191.80	Sanctions Judgment: Analyze Rule 408 Settlement Offer from Dr. McGuckin.
Argentina, Joseph	Counsel	10/18/23	0.8	\$652.00	\$521.60	Review and revise settlement response email from R. Coe (.3); confer with R. Coe re: same
Coe, Richard E.	Partner	10/18/23	0.6	\$757.00	\$454.20	Draft response to McGuckin settlement proposal and review document in McGuckin False Claim Act case
Coe, Richard E.	Partner	10/18/23	0.6	\$757.00	\$454.20	Conference with J. Argentina re: settlement issues
McHugh, Brendan P.	Associate	10/18/23	0.2	\$479.50	\$95.90	Sanctions Judgment: Correspondence with Messrs. R. Coe and J. Argentina regarding Rule 408 Settlement Proposal from McGuckin.
Coe, Richard E.	Partner	10/20/23	1.1	\$757.00	\$832.70	Review McGuckin financial disclosures (0.7 hours) and conference with J. Argentina re: same (0.4 hours)
McHugh, Brendan P.	Associate	10/20/23	0.7	\$479.50	\$335.65	Sanctions Judgment: Analyze production made by McGuckin (.6); analyze e-mail correspondence from Mr. R. Coe regarding the same (.1).
Coe, Richard E.	Partner	10/24/23	0.7	\$757.00	\$529.90	Review additional materials re: McGuckin assets and exchange emails with J. Argentina re:
McHugh, Brendan P.	Associate	10/24/23	0.7	\$479.50	\$335.65	Sanctions Judgment: Analyze correspondence from Messrs. J. Argentina and R. Coe regarding strategy and next steps (.4); analyze records and documents related to real property owned and/or disposed of by McGuckin in Maine (.3).
Argentina, Joseph	Counsel	10/25/23	1.0	\$652.00	\$652.00	Sanctions Judgment: Confer with R. Coe and B. McHugh re: McGuckin discovery responses and next steps
Argentina, Joseph	Counsel	10/25/23	4.2	\$652.00	\$2,738.40	Sanctions Judgment: continue draft of motion for discovery sanctions
Coe, Richard E.	Partner	10/25/23	1.2	\$757.00	\$908.40	Meeting with J. Argentina and B. McHugh re: McGuckin assets, execution strategy, and settlement strategy
McHugh, Brendan P.	Associate	10/26/23	0.2	\$479.50	\$95.90	Sanctions judgment: Analyze correspondence from Mr. J. Argentina regarding McGuckin's testimony before the bankruptcy court.
Coe, Richard E.	Partner	10/31/23	0.3	\$757.00	\$227.10	Exchange emails with client and J. Argentina re: communications with McGuckin lender and settlement
Argentina, Joseph	Counsel	10/31/23	0.3	\$652.00	\$195.60	Sanctions Judgment: E-mail correspondence with R. Coe re: McGuckin mortgage issues
Rank, Robin E.	Paralegal	11/01/23	1.2	\$385.00	\$462.00	Prepare Notices of Appearance for J. Argentina for Bucks, Northampton and Monroe Counties; review court docket to confirm whether Heim has entered an appearance; forward pleadings to B. McHugh for review
Argentina, Joseph	Counsel	11/01/23	1.4	\$652.00	\$912.80	Sanctions Judgment: analyze potential for separate complaint on fraudulent transfer of Maine properties (.8); confer with B. McHugh re: same and declaration in support of sanctions Motion (.6)
McHugh, Brendan P.	Associate	11/01/23	0.5	\$479.50	\$239.75	Sanctions Judgment: Edit entries of appearances drafted by Ms. Robin Rank (.2); correspondence with Ms. Robin Rank and Mr. J. Argentina regarding next steps for the

Rank, Robin E.	Paralegal	11/02/23	0.5	\$385.00	\$192.50	Communications with J. Argentina and B. McHugh regarding finalizing entry of appearance and filing; finalize document; efile with court; prepare instructions and send to McGuckin and Philadelphia Vascular
Argentina, Joseph	Counsel	11/02/23	0.4	\$652.00	\$260.80	Sanctions Judgment: revise garnishment documents for Rex LP and assign additional revisions to R. Rank
Coe, Richard E.	Partner	11/02/23	0.3	\$757.00	\$227.10	Conference with J. Argentina re: same
Coe, Richard E.	Partner	11/02/23	0.2	\$757.00	\$151.40	Conference with client re: collection and settlement issues
McHugh, Brendan P.	Associate	11/02/23	0.2	\$479.50	\$95.90	Sanctions Judgment: Analyze correspondence from Mr. J. Argentina regarding garnishment proceedings against Rex.
Rank, Robin E.	Paralegal	11/03/23	1.1	\$385.00	\$423.50	Revise writ documents for Rex Medical; communications with J. Argentina and B. McHugh regarding same; efile writ
Argentina, Joseph	Counsel	11/03/23	0.4	\$652.00	\$260.80	Sanctions Judgment: finalize, execute, and coordinate filing of praecipe and related files for Rex garnishment
McHugh, Brendan P.	Associate	11/03/23	0.2	\$479.50	\$95.90	Sanctions Judgment: Analyze filings related to garnishment of Rex, LP.
Argentina, Joseph	Counsel	11/06/23	0.1	\$652.00	\$65.20	Sanctions Judgment: E-mail correspondence with R. Coe re: McGuckin mortgage payoff
Coe, Richard E.	Partner	11/06/23	0.2	\$757.00	\$151.40	Exchange emails with J. Argentina re: payoff letter and conference with client re: same
Rank, Robin E.	Paralegal	11/07/23	0.2	\$385.00	\$77.00	Communications with B. McHugh regarding Rex Medical Writ
Argentina, Joseph	Counsel	11/07/23	0.5	\$652.00	\$326.00	Sanctions Judgment: draft payoff letter for McGuckin mortgage title company and related email correspondence with title company personnel
Argentina, Joseph	Counsel	11/07/23	0.2	\$652.00	\$130.40	Sanctions Judgment: confer with B. McHugh re: Rex garnishment.
McHugh, Brendan P.	Associate	11/07/23	1.1	\$479.50	\$527.45	Sanctions Judgment: Analyze garnishment writ issues against Rex Medical LP and analyze strategy and next steps related to the same (.8); correspondence and conference call with Ms. Robin Rank regarding the same (.3).
McHugh, Brendan P.	Associate	11/07/23	0.3	\$479.50	\$143.85	Sanctions Judgment: Strategy meetings with Mr. J. Argentina.
McHugh, Brendan P.	Associate	11/07/23	0.8	\$479.50	\$383.60	Sanctions Judgment: Analyze strategy and next steps related to possible fraudulent transfer action.
Jackson, Patrick A.	Partner	11/08/23	0.4	\$927.50	\$371.00	Call with J. Argentina re: fraudulent transfer litigation strategy
Argentina, Joseph	Counsel	11/08/23	0.2	\$652.00	\$130.40	Sanctions Judgment: email to client re: McGuckin mortgage
Argentina, Joseph	Counsel	11/08/23	0.4	\$652.00	\$260.80	Confer with P. Jackson on whether bankruptcy court has jurisdiction to hear fraudulent transfer action against McGuckin
McHugh, Brendan P.	Associate	11/08/23	0.3	\$479.50	\$143.85	Sanctions Judgment: Meet with Mr. J. Argentina regarding strategy and next steps
Bonsell, Kaitlyn E.	Paralegal	11/13/23	0.6	\$328.13	\$196.88	Revise motion for sanctions.
McHugh, Brendan P.	Associate	11/13/23	0.7	\$479.50	\$335.65	Sanctions Judgment: Attention to service of garnishment writ upon Rex Medical LP, including deadline for the same (.5); correspondence with Ms. Robin Rank regarding the same (.1); separate correspondence with Mr. J. Argentina regarding the same (.1).
Coe, Richard E.	Partner	11/14/23	0.3	\$757.00	\$227.10	Review edits to motion for sanctions and exchange emails re: same
Argentina, Joseph	Counsel	11/14/23	0.8	\$652.00	\$521.60	Sanctions Judgment: review comments and edits from R. Coe to Sanctions Motion and integrate same
Argentina, Joseph	Counsel	11/14/23	0.3	\$652.00	\$195.60	Sanctions Judgment: review and revise Stay Motion and Sanctions Motion.
Argentina, Joseph	Counsel	11/15/23	2.8	\$652.00	\$1,825.60	Revise draft proof of claim and statement of claim; prepare exhibits; related email with client; file proof of claim
Argentina, Joseph	Counsel	11/15/23	0.5	\$652.00	\$326.00	Sanctions Judgment: conference with R. Coe re: motion for sanctions and other collection
Coe, Richard E.	Partner	11/15/23	0.8	\$757.00	\$605.60	Review prior research and briefing and send email to J. Argentina re: venue issues (0.3 hours); conference with client re: settlement (0.1 hours); conference with D. Heim re: same (0.1 hours); conference with J. Argentina re: same (0.3 hours)
McHugh, Brendan P.	Associate	11/15/23	0.4	\$479.50	\$191.80	Sanctions Judgment: Strategy discussion with Mr. R. Coe (.2); attention to e-mails from Mr. J. Argentina and Ms. Robin Rank regarding service of the Rex Medical garnishment

Rank, Robin E.	Paralegal	11/16/23	1.8	\$385.00	\$693.00	Communications with Montgomery Sheriff's Office regarding fees and number of copies needed for service of Writ package on Rex Medical; draft letter to Montgomery Sheriff; attention to details for transmitting writ package and fees to Montgomery Sheriff
Bonsell, Kaitlyn E.	Paralegal	11/16/23	3.0	\$328.13	\$984.38	Revise Motion for Sanctions.
McHugh, Brendan P.	Associate	11/16/23	0.3	\$479.50	\$143.85	Sanctions Judgment: Correspondence with Ms. Robin Rank regarding service of the garnishment writ upon Rex Medical in Montgomery County.
Argentina, Joseph	Counsel	11/17/23	2.9	\$652.00	\$1,890.80	Sanctions Judgment: begin draft of fraudulent transfer complaint
Argentina, Joseph	Counsel	11/20/23	2.8	\$652.00	\$1,825.60	Sanctions Judgment: Legal research on procedural issues in fraudulent transfer claims in Pennsylvania (complaint vs motion vs petition)
Argentina, Joseph	Counsel	11/20/23	1.1	\$652.00	\$717.20	Sanctions Judgment: Legal research on elements of constructive trust and alter ego claims
Argentina, Joseph	Counsel	11/20/23	2.2	\$652.00	\$1,434.40	Sanctions Judgment: continue research and drafting for fraudulent transfer complaint
McHugh, Brendan P.	Associate	11/20/23	0.4	\$479.50	\$191.80	Sanctions Judgment: Call to the Montgomery County prothonotary regarding the discovery-related certification required (.2); e-mail correspondence with Mr. J. Argentina regarding the same (.2).
Argentina, Joseph	Counsel	11/21/23	4.8	\$652.00	\$3,129.60	Sanctions Judgment: research and drafting of fraudulent transfer complaint
Argentina, Joseph	Counsel	11/22/23	0.4	\$652.00	\$260.80	Sanctions Judgment: review return of service filing from Montgomery County Sheriff and related email with client re: service of same
Argentina, Joseph	Counsel	11/22/23	1.8	\$652.00	\$1,173.60	Sanctions Judgment: finalize fraudulent transfer complaint and email FDBR team.
McHugh, Brendan P.	Associate	11/22/23	4.0	\$479.50	\$1,918.00	Draft and edit Complaint for Avoidance of Fraudulent Transfers in Montgomery County Court of Common Pleas (2.1); correspondence with Messrs. J. Argentina and R. Coe regarding the same (.3); research and analyze various civil procedure rules and case law in connection with the same (1.6).
McHugh, Brendan P.	Associate	11/22/23	0.3	\$479.50	\$143.85	Sanctions Judgment: Attention to service of garnishment writ upon Rex LP.
Rank, Robin E.		11/27/23	0.5	\$385.00	\$192.50	Communications with B. McHugh regarding updating address and filing new pleadings for Rex Medical; calculate interest through 11/28/23 and revise pleadings; circulate for review to J. Argentina and B. McHugh
Argentina, Joseph	Counsel	11/27/23	0.6	\$652.00	\$391.20	Sanctions Judgment: review Montgomery county case docket and email B. McHugh re: additional service of Rex writ (.3); confer with B. McHugh re: implications of additional service of Rex writ (.3)
McHugh, Brendan P.	Associate	11/27/23	0.6	\$479.50	\$287.70	Sanctions Judgment: Correspondence from Mr. J. Argentina regarding fraudulent transfer complaint and review and revise same
McHugh, Brendan P.	Associate	11/27/23	1.4	\$479.50	\$671.30	Sanctions Judgment: Conference call with Montgomery County Sheriff's office regarding service of garnishment writ upon Rex Medical LP (.3); follow-up call with Montgomery County prothonotary's office re: same (.2); analyze strategy and next steps related to the same (.5); confer with Mr. J. Argentina regarding the same (.2); e-mail to Ms. Robin Rank regarding new garnishment writ to Rex Medical LP ( 2 )
McHugh, Brendan P.	Associate	11/27/23	0.7	\$479.50	\$335.65	Sanctions Judgment: Edit amended garnishment writ to Rex Medical LP (.5); correspondence with Ms. Robin Rank and Mr. J. Argentina regarding the same (.2).
McHugh, Brendan P.	Associate	11/27/23	1.5	\$479.50	\$719.25	Sanctions Judgment: Research regarding the Pennsylvania Uniform Voidable Transactions Act, 12 Pa. C.S.A. Sections 5101 to 5114.
Rank, Robin E.	Paralegal	11/28/23	1.7	\$385.00	\$654.50	Communications with J. Argentina regarding Rex Medical filing; review and finalize documents; efile pleadings
Argentina, Joseph	Counsel	11/28/23	1.3	\$652.00	\$847.60	Sanctions Judgment: review and incorporate edits to Fraudulent Transfer complaint from
Argentina, Joseph	Counsel	11/28/23	0.3	\$652.00	\$195.60	Sanctions Judgment: multiple email correspondences with FDBR personnel re: filings in Montgomery County CCP
Argentina, Joseph	Counsel	11/28/23	0.6	\$652.00	\$391.20	Sanctions Judgment: review and incorporate proposed edits to fraudulent transfer
Argentina, Joseph	Counsel	11/28/23	0.3	\$652.00	\$195.60	Sanctions Judgment: review revised Rex writ and related documents



Coe, Richard E.	Partner	11/28/23	0.8	\$757.00	\$605.60	Review and revise fraudulent transfer complaint and send email to J. Argentina re: same
McHugh, Brendan P.	Associate	11/28/23	0.8	\$479.50	\$383.60	Sanctions Judgment: Review and analyze further edits to the fraudulent transfer complaint made by Mr. J. Argentina and additional comments and edits from Mr. R. Coe.
Rank, Robin E.	Paralegal	11/29/23	1.5	\$385.00	\$577.50	Communications with J. Argentina regarding e-filing; draft letter to Montgomery County Sheriff for service of writ; draft order for services; review court website to download executed writ; prepare package for Sheriff
Argentina, Joseph	Counsel	11/29/23	1.8	\$652.00	\$1,173.60	Sanctions Judgment: revise fraudulent transfer complaint to remove exhibits, other edits
Argentina, Joseph	Counsel	11/29/23	1.2	\$652.00	\$782.40	Sanctions Judgment: confer with B. McHugh re: exhibits in FT complaint, service, docketing issues, specific allegations related to fund transfers
Argentina, Joseph	Counsel	11/29/23	0.1	\$652.00	\$65.20	Email correspondence to counsel to Trustee re: status of derivative claims
Coe, Richard E.	Partner	11/29/23	0.6	\$757.00	\$454.20	Review and revise fraudulent transfer complaint; exchange emails re: same and conference with B. McHugh re: same
McHugh, Brendan P.	Associate	11/29/23	2.7	\$479.50	\$1,294.65	Sanctions Judgment: Strategy meeting with Mr. J. Argentina regarding the fraudulent transfer complaint (1.3); further draft and revise the same (1.0); analyze correspondence from Mr. J. Argentina and Mr. R/ Coe regarding the same (.2); e-mail correspondence to Messrs. Coe and Argentina regarding the same (.2).
Rank, Robin E.	Paralegal	11/30/23	0.3	\$385.00	\$115.50	Communications with B. McHugh regarding signed writ; prepare and send sheriff's package to Excel for transmitting to Sheriff
Argentina, Joseph	Counsel	11/30/23	1.6	\$652.00	\$1,043.20	Sanctions Judgment: review and research state and local rules on service of fraudulent transfer complaint and other filing requirements
Argentina, Joseph	Counsel	11/30/23	0.2	\$652.00	\$130.40	Sanctions Judgment: review and revise notice to defend fraudulent transfer complaint
Argentina, Joseph	Counsel	11/30/23	0.3	\$652.00	\$195.60	Sanctions Judgment: email to client re: fraudulent transfer complaint and related files
Argentina, Joseph	Counsel	11/30/23	0.3	\$652.00	\$195.60	Sanctions Judgment: email correspondence with mortgage lender and client re: mortgage on McGuckin real property
Argentina, Joseph	Counsel	11/30/23	0.7	\$652.00	\$456.40	Sanctions Judgment: internal correspondence regarding finalizing fraudulent transfer
Argentina, Joseph	Counsel	11/30/23	2.8	\$652.00	\$1,825.60	Sanctions Judgment: final multiple rounds of revision to finalize draft of Fraudulent Transfer complaint
Argentina, Joseph	Counsel	11/30/23	0.4	\$652.00	\$260.80	Sanctions Judgment: draft verification in support of fraudulent transfer complaint
McHugh, Brendan P.	Associate	11/30/23	0.3	\$479.50	\$143.85	Sanctions Judgment: Correspondence with Ms. Robin Rank regarding garnishment writ to Rex Medical LP; analyze docket in connection with the same.
McHugh, Brendan P.	Associate	11/30/23	1.7	\$479.50	\$815.15	Sanctions Judgment: Further review and edit fraudulent transfer complaint (1.3); correspondence with Mr. J. Argentina regarding the same (.4).
McHugh, Brendan P.	Associate	11/30/23	0.7	\$479.50	\$335.65	Sanctions Judgment: Research and analyze filing requirements for the fraudulent transfer complaint (.4); e-mail correspondence with Mr. J. Argentina regarding the same (.3).
Rank, Robin E.	Paralegal	12/01/23	0.1	\$385.00	\$38.50	Communications with team to confirm the Rex Medical Writ package has been sent to the Montgomery County Sheriff for service
Argentina, Joseph	Counsel	12/01/23	0.4	\$652.00	\$260.80	Sanctions Judgment: draft payoff letter to McGuckin lender
Argentina, Joseph	Counsel	12/01/23	1.1	\$652.00	\$717.20	Sanctions Judgment: confer with client re: fraudulent transfer complaint and revise complaint accordingly (.9); coordinate filing and service (.2)
McHugh, Brendan P.	Associate	12/01/23	0.2	\$479.50	\$95.90	Sanctions Judgment: Analyze correspondence from Mr. J. Argentina regarding filing and service of the fraudulent transfer complaint; analyze next steps regarding the same.
Bonsell, Kaitlyn E.	Paralegal	12/04/23	0.9	\$328.12	\$295.31	Finalize and file complaint.
Argentina, Joseph	Counsel	12/04/23	0.3	\$652.00	\$195.60	Sanctions Judgment: coordinate filing of fraudulent transfer complaint
McHugh, Brendan P.	Associate	12/04/23	1.0	\$479.50	\$479.50	Sanctions Judgment: Confer with Ms. Kaitlyn Bonsell regarding filing of Fraudulent Transfer Complaint in Montgomery County (.3); e-mail correspondence with case team regarding the same (.2); further e-mail correspondence with case team regarding service
Bonsell, Kaitlyn E.	Paralegal	12/05/23	0.2	\$328.15	\$65.63	Finish preparing packet for service.

Argentina, Joseph	Counsel	12/05/23	0.2	\$652.00	\$130.40	Sanctions Judgment: E-mail correspondence with K. Bonsell re: service of FT complaint
McHugh, Brendan P.	Associate	12/05/23	0.8	\$479.50	\$383.60	Sanctions Judgment: Correspondence with Ms. Kaitlyn Bonsell regarding service of the fraudulent transfer complaint (.2); analyze the same (.2); strategy meeting with Mr. J. Argentina regarding strategy and next steps (.4).
Coe, Richard E.	Partner	12/07/23	0.5	\$757.00	\$378.50	Conference with J. Argentina re: status of derivative action and collection efforts in preparation for Delaware County Court of Common Pleas conference
McHugh, Brendan P.	Associate	12/07/23	0.4	\$479.50	\$191.80	Sanctions Judgment: Strategy meeting with Mr. J. Argentina and prepare for the same.
McHugh, Brendan P.	Associate	12/08/23	0.5	\$479.50	\$239.75	Sanctions Judgment: Analyze Montgomery County local rules to determine next steps for motion for sanctions and contempt currently pending there.
McHugh, Brendan P.	Associate	12/12/23	0.5	\$479.50	\$239.75	Sanctions Judgment: Follow-up analysis regarding status of fraudulent transfer complaint and writ to Rex Medical LP.
McHugh, Brendan P.	Associate	12/15/23	0.4	\$479.50	\$191.80	Sanctions Judgment: Analyze sheriff's return of service for garnishment writ to Rex Medical LP (.2); correspondence with Mr. J. Argentina regarding the same (.2).
Argentina, Joseph	Counsel	12/19/23	0.8	\$652.00	\$521.60	Sanctions Judgment: review analysis by B. McHugh regarding scheduling for sanctions motion and confer with B. McHugh re: same
Argentina, Joseph	Counsel	12/20/23	0.5	\$652.00	\$326.00	Sanctions Judgment: Confer with W. Gardner re: status of collection actions
McHugh, Brendan P.	Associate	12/21/23	0.7	\$479.50	\$335.65	Sanctions Judgment: Meeting with Mr. J. Argentina regarding strategy and next steps (.4); follow up analysis from the same (.3).
Argentina, Joseph	Counsel	12/22/23	0.2	\$652.00	\$130.40	Sanctions Judgment: confer with B. McHugh re: Delaware County Sheriff failure to serve FT complaint and next steps
Argentina, Joseph	Counsel	12/22/23	0.4	\$652.00	\$260.80	Sanctions Judgment: call to Judge Eisenberg chambers re: sanctions motion
Argentina, Joseph	Counsel	12/22/23	0.3	\$652.00	\$195.60	Sanctions Judgment: review draft praecipe to revive complaint and related email correspondence with K. Bonsell re: filing
McHugh, Brendan P.	Associate	12/22/23	0.4	\$479.50	\$191.80	Sanctions Judgment: Analyze Order setting forth issues to be argued at the February 2024 hearing on Alison McGuckin's petition to set aside real property writ (.2); analyze case law regarding reformation of a real property deed in connection with the same (.2).
Bonsell, Kaitlyn E.	Paralegal	12/26/23	0.5	\$328.12	\$164.06	Reinstate complaint and prepare same for service by Montgomery County and Delaware County sheriffs' offices.
Argentina, Joseph	Counsel	12/26/23	0.7	\$652.00	\$456.40	Sanctions Judgment: coordinate delivery by K. Bonsell of FT complaint and related documents to Montgomery County Sheriff's office
Argentina, Joseph	Counsel	12/27/23	0.8	\$652.00	\$521.60	Sanctions Judgment: analyze potential need to reply to new matter in McGuckins' answer to FT complaint
Argentina, Joseph	Counsel	12/27/23	0.4	\$652.00	\$260.80	Sanctions Judgment: review McGuckins' answer and new matter to FT complaint
McHugh, Brendan P.	Associate	12/27/23	0.3	\$479.50	\$143.85	Sanctions Judgment: Analyze correspondence related to Alison and James McGuckin's answer to the fraudulent transfer complaint against them.
McHugh, Brendan P.	Associate	12/28/23	0.8	\$479.50	\$383.60	Sanctions Judgment: Analyze answer to fraudulent transfer complaint filed by Alison and James McGuckin in Montgomery County.
McHugh, Brendan P.	Associate	12/29/23	0.2	\$479.50	\$95.90	Sanctions Judgment: Analyze correspondence from Mr. J. Argentina regarding New Matter to fraudulent transfer complaint filed by Alison and James McGuckin.
McHugh, Brendan P.	Associate	01/01/24	0.7	\$525.00	\$367.50	Sanctions Judgment: Analyze new matter filed by Alison and James McGuckin in response to Gardner's fraudulent transfer complaint; correspondence with Msrs. Joe Argentina and Rick Coe regarding the same.
Rank, Robin E.		01/02/24	0.1	\$411.30	\$41.13	Attention to Sheriff's Return of Service for Rex Medical
Coe, Richard E.		01/02/24	0.3	\$815.00	\$244.50	Review answer to fraudulent transfer complaint and send email to J. Argentina re: same

McHugh, Brendan P.	Associate	01/02/24	2.0	\$525.00	\$1,050.00	Sanctions Judgment: Analyze answer and new matter to fraudulent transfer complaint filed by Alison and James McGuckin in Montgomery County (.7); correspondence with Msrs. Joe Argentina and Rick Coe regarding the same (.3); research and analyze case law and authority for arguments related to entireties property raised in the same (1.0).
Argentina, Joseph		01/03/24	1.3	\$700.00	\$910.00	Sanctions Judgment: conference with R. Coe and B. McHugh re: hearing on foreclosure and answer to FT complaint (.8); conference with B. McHugh re: research results on deed authentication (.5).
Coe, Richard E.		01/03/24	0.5	\$815.00	\$407.50	Conference with J. Argentina re: collection actions and exchange emails re: evidence needed for hearing
McHugh, Brendan P.	Associate	01/03/24	1.6	\$525.00	\$840.00	Sanctions Judgment: Strategy meeting with Messrs. Rick Coe and Joe Argentina (.6); prepare for the same by analyzing status of collections activities in Montgomery and Delaware Counties (.5); follow up meeting with Mr. Joe Argentina about certain next steps related to the hearing in Delaware County on February 9, 2024 (.5)
McHugh, Brendan P.	Associate	01/03/24	2.0	\$525.00	\$1,050.00	Sanctions Judgment: Research and analysis regarding how to self-authenticate McGuckin's deed in advance of the hearing in Delaware County on February 9, 2024 (1.4); conference calls with the Delaware County Recorder's Office regarding how to obtain a certified copy of the same (.3); correspondence with Messrs. Joe Argentina and Rick Coe regarding the
McHugh, Brendan P.	Associate	01/03/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Analyze strategy and next steps for new matter filed by James and Alison McGuckin in Montgomery County Court of Common Pleas.
McHugh, Brendan P.	Associate	01/04/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze case law regarding whether joint funds maintain status of entireties property.
Argentina, Joseph		01/05/24	2.2	\$700.00	\$1,540.00	Sanctions Judgment: review research on tenancy in entireties law in advance of foreclosure hearing on February 9 and conduct additional research
Argentina, Joseph		01/05/24	0.7	\$700.00	\$490.00	Sanctions Judgment: confer with B. McHugh re: research on tenancy in entireties law in advance of foreclosure hearing on February 9
McHugh, Brendan P.	Associate	01/05/24	0.8	\$525.00	\$420.00	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina.
McHugh, Brendan P.	Associate	01/05/24	2.7	\$525.00	\$1,417.50	Sanctions Judgment: Research and analyze potential argument at February 9th hearing that real property purchased by McGuckin with jointly held funds maintains its status as entireties property (2.5); correspondence with Mr. Joe Argentina regarding the same (.2).
McHugh, Brendan P.	Associate	01/09/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina regarding February 9th hearing in Delaware County (.6); research regarding potential arguments raised by Alison and James McGuckin during the same (.8).
Argentina, Joseph		01/10/24	1.2	\$700.00	\$840.00	Sanctions Judgment: confer with B. McHugh re: February 9 hearing issues
McHugh, Brendan P.	Associate	01/10/24	3.8	\$525.00	\$1,995.00	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina (1.2); research regarding options available regarding garnishment of medical centers owned and operated by McGuckin (1.0); research and analyze bad faith requirements to rebut a showing that property titles in one spouse's name nevertheless constitutes entireties property (1.4)
McHugh, Brendan P.	Associate	01/11/24	1.3	\$525.00	\$682.50	Sanctions Judgment: Draft reply to new matter filed in the Montgomery County Action and related documents for filing (.6); further analyze Answer and New Matter in connection with the same (.4); e-mail correspondence with Mr. Joe Argentina regarding
Argentina, Joseph		01/12/24	0.3	\$700.00	\$210.00	Sanctions Judgment: review draft reply to new matter in FT answer and related email to B. McHugh
McHugh, Brendan P.	Associate	01/12/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Finalize reply to James and Alison McGuckin's new matter for filing (.3); correspondence with Ms. Robin Rank regarding the same (.2).
McHugh, Brendan P.	Associate	01/15/24	0.9	\$525.00	\$472.50	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina regarding February 9th hearing in Delaware County (.4); analyze equity-based arguments advanced by Alison McGuckin in connection with determining next steps (.5).

Rank, Robin E.		01/16/24	0.5	\$411.26	\$205.63	Prepare documents for efilng; upload and efile with Montgomery County Court of Common Pleas; communications with B. McHugh and J. Argentina confirming documents
Argentina, Joseph		01/16/24	1.3	\$700.00	\$910.00	Sanctions Judgment: analyze potential new fraudulent transfer theory (.7); confer with B. McHugh re: same (.6).
McHugh, Brendan P.	Associate	01/16/24	1.0	\$525.00	\$525.00	Sanctions Judgment: Analyze next steps regarding fraudulent transfer action.
Rank, Robin E.		01/17/24	0.4	\$411.25	\$164.50	Communications with J. Argentina confirming court filing was accepted; review court website to download file stamped pleadings; circulate to team and file in matter file
Argentina, Joseph		01/17/24	1.2	\$700.00	\$840.00	Sanctions Judgment: confer with B. McHugh re: most recent production of files from McGuckin and PVI and next steps
McHugh, Brendan P.	Associate	01/17/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Review and analyze fraudulent transfer complaint to determine possible need for amendment given McGuckin's discovery responses received on 1/16.
McHugh, Brendan P.	Associate	01/17/24	0.8	\$525.00	\$420.00	Sanctions Judgment: Research next steps for the fraudulent transfer action and draft e-mail to J. Argentina regarding the same.
Argentina, Joseph		01/18/24	0.4	\$700.00	\$280.00	Sanctions Judgment: confer with R. Coe re: potential settlement of Sanctions Judgment
Argentina, Joseph		01/18/24	4.8	\$700.00	\$3,360.00	Sanctions Judgment: legal research of issues in advance of February 9 hearing in Delaware County foreclosure hearing
Argentina, Joseph		01/18/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with counsel to McGuckin re: potential
McHugh, Brendan P.	Associate	01/18/24	1.2	\$525.00	\$630.00	Sanctions Judgment: Research and analyze "accident" as a ground for deed reformation in preparation for hearing before Judge Dozer on February 9, 2024 (1.0); correspondence with Mr. Joe Argentina regarding the same (.2).
McHugh, Brendan P.	Associate	01/18/24	0.2	\$525.00	\$105.00	Sanctions Judgment: E-mail correspondence with Mr. Joe Argentina regarding authentication of certified deed during hearing before Judge Dozer (Delaware County) on
Argentina, Joseph		01/19/24	1.2	\$700.00	\$840.00	Sanctions Judgment: confer with B. McHugh re: February 9 hearing issues and settlement
Argentina, Joseph		01/19/24	1.1	\$700.00	\$770.00	Sanctions Judgment: multiple E-mail correspondence with D. Heim, client and FDBR re: settlement
Argentina, Joseph		01/19/24	2.3	\$700.00	\$1,610.00	Sanctions Judgment: analyze settlement issues and draft term sheet for file
Argentina, Joseph		01/19/24	0.4	\$700.00	\$280.00	Call with counsel to Trustee regarding Cohen and other case issues
McHugh, Brendan P.	Associate	01/19/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze correspondence from Mr. Joe Argentina regarding settlement discussions .
Argentina, Joseph		01/22/24	0.9	\$700.00	\$630.00	Sanctions Judgment: conferences with W. Gardner (.4) and R. Coe (.5) re: settlement
Argentina, Joseph		01/22/24	0.6	\$700.00	\$420.00	Sanctions Judgment: analyze potential settlement strategies in advance of call with client
Coe, Richard E.		01/22/24	0.5	\$815.00	\$407.50	Conference with J. Argentina re: settlement issues
Rank, Robin E.		01/23/24	0.2	\$411.25	\$82.25	Communications with J. Argentina and B. McHugh regarding recent filings
Argentina, Joseph		01/23/24	1.1	\$700.00	\$770.00	Sanctions Judgment: confer with B. McHugh re: reply brief
Argentina, Joseph		01/23/24	2.4	\$700.00	\$1,680.00	Sanctions Judgment: legal research on stay of execution pending appeal
Argentina, Joseph		01/23/24	0.4	\$700.00	\$280.00	Sanctions Judgment: confer with B. McHugh re: reply brief
Argentina, Joseph		01/24/24	0.5	\$700.00	\$350.00	Sanctions Judgment: email and phone correspondence with real property appraiser in connection with foreclosure action
Argentina, Joseph		01/24/24	1.2	\$700.00	\$840.00	Sanctions Judgment: confer with client regarding foreclosure issues
Argentina, Joseph		01/24/24	1.5	\$700.00	\$1,050.00	Sanctions Judgment: conferences with B. McHugh and R. Coe regarding foreclosure issues
Argentina, Joseph		01/24/24	3.6	\$700.00	\$2,520.00	Sanctions Judgment: continue to revise reply brief
McHugh, Brendan P.	Associate	01/24/24	3.3	\$525.00	\$1,732.50	Sanctions Judgment: Research and analyze legal arguments and framework regarding whether appeal of the Sanctions Judgment can serve as grounds for stay of execution in Delaware County (1.9): analyze arguments to be made that it should not (1.4).
Argentina, Joseph		01/25/24	0.2	\$700.00	\$140.00	E-mail correspondence with counsel to McGuckin re: global settlement
Argentina, Joseph		01/25/24	0.7	\$700.00	\$490.00	Sanctions Judgment: confer with B. McHugh re: results of his legal research on security requirements when foreclosure is appealed

McHugh, Brendan P.	Associate	01/25/24	1.3	\$525.00	\$682.50	Sanctions Judgment: Further research and analyze legal arguments and framework regarding whether appeal of the Sanctions Judgment can serve as grounds for stay of execution in Delaware County.
McHugh, Brendan P.	Associate	01/25/24	0.8	\$525.00	\$420.00	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina regarding February 9, 2024 hearing before Judge Dozer in Delaware County.
Argentina, Joseph		01/26/24	0.4	\$700.00	\$280.00	Sanctions Judgment: confer with B. McHugh re: results of his legal research and hearing
McHugh, Brendan P.	Associate	01/26/24	0.7	\$525.00	\$367.50	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina regarding February 9, 2024 hearing before Judge Dozer in Delaware County.
McHugh, Brendan P.	Associate	01/26/24	4.0	\$525.00	\$2,100.00	Sanctions Judgment: Research and analyze case law related to automatic stays pending appeal pursuant to Pennsylvania Rules of Appellate Procedure (1.7); research and analyze case law and arguments related to whether a judgment lien is fairly considered sufficient security pending appeal (1.5); research and analyze equitable considerations for discretionary stay pursuant to Pa.R.Civ.P. 3121 (.8)
McHugh, Brendan P.	Associate	01/27/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze Pa.R.E. 803 (regarding exceptions to the rule against hearsay) to confirm admissibility of certified deed during February 9th hearing before Judge Dozer in Delaware County.
McHugh, Brendan P.	Associate	01/27/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Research and analyze equitable considerations for discretionary stay pursuant to Pa.R.Civ.P. 3121.
Argentina, Joseph		01/29/24	0.2	\$700.00	\$140.00	Sanctions Judgment: review filing in Montgomery County docket by prothonotary
Argentina, Joseph		01/29/24	0.4	\$700.00	\$280.00	Sanctions Judgment: analysis of potential stipulation of facts for February 9 hearing
Argentina, Joseph		01/29/24	0.3	\$700.00	\$210.00	Sanctions Judgment: confer with client re: appraiser and other February 9 hearing issues
McHugh, Brendan P.	Associate	01/29/24	1.1	\$525.00	\$577.50	Sanctions Judgment: Research and analyze case law regarding equitable considerations for discretionary stay pursuant to Pa.R.Civ.P. 3121 (1.1).
Argentina, Joseph		01/30/24	1.4	\$700.00	\$980.00	Sanctions Judgment: legal research regarding equitable grounds to stay execution
McHugh, Brendan P.	Associate	01/30/24	3.7	\$525.00	\$1,942.50	Sanctions Judgment: Research regarding adequate security for a bond, including case law discussing sufficiency of a judgment lien in real property.
McHugh, Brendan P.	Associate	01/30/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Analyze returns filed on Montgomery County docket today.
McHugh, Brendan P.	Associate	01/31/24	2.4	\$525.00	\$1,260.00	Sanctions Judgment: Research regarding adequate security for a bond, including case law discussing sufficiency of a judgment lien in real property (1.4); analyze potential arguments pursuant to Pa.R.Civ.P. 3119 related to the same (.6); detailed e-mail correspondence with Mr. Joe Argentina regarding the same (.4).
Rank, Robin E.	Paralegal	02/01/24	0.3	\$411.27	\$123.38	Communications with J. Argentina regarding refund from Northampton Sheriff for unused portion of deposit; attention to file maintenance
Argentina, Joseph	Counsel	02/01/24	0.8	\$700.00	\$560.00	Sanctions Judgment: draft witness and exhibit list for February 9 hearing
Argentina, Joseph	Counsel	02/01/24	0.4	\$700.00	\$280.00	Sanctions Judgment: confer with B. McHugh re: results of legal research on lien value and stay pending appeal
McHugh, Brendan P.	Associate	02/01/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Follow-up correspondence with Mr. Joe Argentina regarding case law informing discretion afforded a judge when deciding whether to stay execution.
McHugh, Brendan P.	Associate	02/01/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Strategy call with Mr. Joe Argentina regarding exhibits and arguments for hearing on February 9th before Judge Dozer.
McHugh, Brendan P.	Associate	02/01/24	0.9	\$525.00	\$472.50	Sanctions Judgment: Analyze correspondence from Montgomery and Delaware County Sheriff's offices regarding service of the Fraudulent Transfer Complaint in Montgomery County (.4); analyze next steps regarding the same (.2); correspondence with Mr. Joe Argentina and Ms. Kaitlyn Bonsell regarding the same (.3).
McHugh, Brendan P.	Associate	02/01/24	1.1	\$525.00	\$577.50	Sanctions Judgment: Research and analyze whether, by filing an answer to Gardner's fraudulent transfer complaint, McGuckin and his wife waived any service-based arguments that they might have.

Argentina, Joseph	Counsel	02/02/24	0.4	\$700.00	\$280.00	Sanctions Judgment: finalize and deliver witness and exhibit list for February 9 hearing
Argentina, Joseph	Counsel	02/02/24	1.6	\$700.00	\$1,120.00	Sanctions Judgment: review and analyze settlement offer from counsel to McGuckin (.6); review valuation report related to settlement offer (.6); related email correspondence
Argentina, Joseph	Counsel	02/02/24	0.4	\$700.00	\$280.00	Sanctions Judgment: review and analyze McGuckin witness and exhibit list for February 9 hearing
McHugh, Brendan P.	Associate	02/02/24	1.0	\$525.00	\$525.00	Sanctions: Analyze potential arguments regarding service of the writ and notice of sale based upon the same (.8); correspondence with Mr. Joe Argentina regarding the same
Argentina, Joseph	Counsel	02/05/24	0.5	\$700.00	\$350.00	Sanctions Judgment: E-mail correspondence with counsel to McGuckin re: continuance of February 9 hearing
Argentina, Joseph	Counsel	02/05/24	1.0	\$700.00	\$700.00	Sanctions Judgment: confer with client re: last McGuckin settlement proposal (.6); initial review of documents related to settlement proposal (.4).
McHugh, Brendan P.	Associate	02/05/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze correspondence from Mr. Joe Argentina regarding Mr. Heim's request to postpone the February 9th hearing on account of Alison McGuckin's unavailability (.1); analyze settlement correspondence from Mr. Argentina as well (.1).
McHugh, Brendan P.	Associate	02/05/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Strategy call with Mr. Joe Argentina re: preparation for hearing and request for postponement.
Argentina, Joseph	Counsel	02/06/24	0.3	\$700.00	\$210.00	Sanctions Judgment: confer with client re: continuance of February 9 foreclosure hearing
Argentina, Joseph	Counsel	02/06/24	0.5	\$700.00	\$350.00	Sanctions Judgment: E-mail correspondence with counsel to McGuckin re: continuance of February 9 foreclosure hearing
Argentina, Joseph	Counsel	02/06/24	1.8	\$700.00	\$1,260.00	Sanctions Judgment: draft settlement proposal for Sanctions Judgment and related email to client
Argentina, Joseph	Counsel	02/06/24	0.1	\$700.00	\$70.00	Sanctions Judgment: review letter to Court from counsel to McGuckin re: continuance of February 9 foreclosure hearing
Coe, Richard E.	Partner	02/06/24	0.3	\$815.00	\$244.50	Exchange emails with J. Argentina re: McGuckin settlement proposal and estimate of additional fees subject to sanctions award
McHugh, Brendan P.	Associate	02/07/24	3.6	\$585.00	\$2,106.00	Sanctions Judgment: Analyze strategy and next steps regarding hearing on Alison McGuckin's petition to stay and set aside writ of execution for real property in Delaware County (.6); strategy meeting with Mr. Joe Argentina regarding the same (.3); analyze procedural requires and steps to effectuate a charging order against various medical centers in which McGuckin has an ownership interest (1.0); analyze letter from Northampton County Sheriff's office regarding garnishment writ served upon Lehigh Valley Vascular Institute (.2); conference call with Northampton County Sheriff's office regarding the same (.2); analyze strategy and next steps regarding the same, including analysis of docket, documents filed, and rules related to writ abandonment (1.0);
Argentina, Joseph	Counsel	02/07/24	0.2	\$700.00	\$140.00	Sanctions Judgment: review edits to settlement proposal from W. Gardner
Argentina, Joseph	Counsel	02/07/24	1.7	\$700.00	\$1,190.00	Sanctions Judgment: prepare for February 9 hearing on McGuckin foreclosure action (analyze potential continuance issues and gather exhibits)
Coe, Richard E.	Partner	02/07/24	0.2	\$815.00	\$163.00	Exchange emails with J. Argentina and accounting department re: fee request
Argentina, Joseph	Counsel	02/08/24	0.8	\$700.00	\$560.00	Sanctions Judgment: revise settlement term sheet
Argentina, Joseph	Counsel	02/08/24	0.3	\$700.00	\$210.00	Sanctions Judgment: E-mail correspondence with Delaware County Court regarding February 9 hearing
Argentina, Joseph	Counsel	02/08/24	0.4	\$700.00	\$280.00	Sanctions Judgment: confer with client re: settlement term sheet
Argentina, Joseph	Counsel	02/08/24	1.8	\$700.00	\$1,260.00	Sanctions Judgment: analyze prior fees and expense data and filings in connection with possible new sanctions demand
McHugh, Brendan P.	Associate	02/08/24	1.3	\$525.00	\$682.50	Sanctions Judgment: Research and analyze procedural steps to obtain a charging order against an LLC interest.

Argentina, Joseph	Counsel	02/09/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with FDBR personnel re: new Northampton County writ package (Lehigh Vascular)
Argentina, Joseph	Counsel	02/09/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with Delaware County Court personnel re: rescheduling hearing
Argentina, Joseph	Counsel	02/09/24	0.5	\$700.00	\$350.00	Sanctions Judgment: analyze Rex pledge agreements for possible effect on Sanctions
Argentina, Joseph	Counsel	02/09/24	2.2	\$700.00	\$1,540.00	Sanctions Judgment: analyze potential appellate issues in connection with settlement proposal (.9); confer with Gardner re: terms (.2); revise settlement terms and send to counsel to McGuckin (1.1).
Rank, Robin E.	Paralegal	02/09/24	2.6	\$411.25	\$1,069.25	Communications with B. McHugh regarding refiling Lehigh Valley Vascular Institute writ and interrogatories; revise pleadings and calculate new fees and send to B. McHugh for review; prepare Order for Service and draft transmittal letter to Northampton Prothonotary's office; prepare and send entry of appearance to Office Services for mailing to defendants; request checks for filing and service fees; prepare instruction for filing and service and send to R. Longo, LAA
McHugh, Brendan P.	Associate	02/09/24	1.2	\$525.00	\$630.00	Sanctions Judgment: Edit entry of appearance for Northampton County action for filing (.3); edits writ and related filings against Lehigh Valley Vascular Institute, LLC in Northampton County (.6); correspondence with Ms. Robin Rank regarding filing and
McHugh, Brendan P.	Associate	02/09/24	1.6	\$525.00	\$840.00	Sanctions Judgment: Analyze DOJ Complaint against McGuckin and documents produced in discovery to determine ownership structure of various McGuckin centers for purposes of possible charging orders against the same.
McHugh, Brendan P.	Associate	02/09/24	1.7	\$525.00	\$892.50	Sanctions Judgment: Further research and analyze procedural steps to obtain a charging order against an LLC interest (1.1); analyze enforcement options available against McGuckin's interests in various professional corporations (.6).
McHugh, Brendan P.	Associate	02/10/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Analyze next steps surrounding collection efforts targeted towards McGuckin-owned centers (.5); analyze tax returns and related documents produced by McGuckin in connection with the same (.6); correspondence with Mr. Joe Argentina
Argentina, Joseph	Counsel	02/12/24	2.7	\$700.00	\$1,890.00	Sanctions Judgment: legal research on Bankruptcy Court jurisdiction to enforce its own orders even if the outcome of litigation would not affect the bankruptcy estate in connection with possible charging orders against McGuckin centers
Argentina, Joseph	Counsel	02/12/24	0.7	\$700.00	\$490.00	Sanctions Judgment: review documents produced by McGuckin in connection with possible charging orders against McGuckin centers
McHugh, Brendan P.	Associate	02/12/24	1.3	\$525.00	\$682.50	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina regarding charging orders against McGuckin-owned entities (.4); analyze strategy and procedural considerations regarding the same (.5); analyze strategy and next steps related to fraudulent transfer action (.4) pending in Montgomery County.
McHugh, Brendan P.	Associate	02/12/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze tax returns and similar documents produced by McGuckin in connection with possible charging orders against medical centers owned by him.
Rank, Robin E.	Paralegal	02/13/24	0.1	\$411.30	\$41.13	Communications with R. Longo regarding preparing package to send to Northampton Court of Common Pleas
Argentina, Joseph	Counsel	02/13/24	0.3	\$700.00	\$210.00	Sanctions Judgment: confer with R. Coe re: motion for contempt
Argentina, Joseph	Counsel	02/13/24	0.8	\$700.00	\$560.00	Sanctions Judgment: confer with B. McHugh re: motion for contempt
Argentina, Joseph	Counsel	02/13/24	0.6	\$700.00	\$420.00	Sanctions Judgment: assign legal research to R. Imani re: motion for contempt
Argentina, Joseph	Counsel	02/13/24	2.6	\$700.00	\$1,820.00	Sanctions Judgment: legal research re: motion for contempt
Argentina, Joseph	Counsel	02/13/24	2.4	\$700.00	\$1,680.00	Sanctions Judgment: Begin draft of motion for contempt
Coe, Richard E.	Partner	02/13/24	0.3	\$815.00	\$244.50	Conference with J. Argentina re: motion for sanctions and contempt
Imani, Roya	Associate	02/13/24	0.1	\$643.10	\$64.31	Sanctions Judgment: attention to emails from J. Argentina regarding research assignment
Imani, Roya	Associate	02/13/24	1.4	\$643.13	\$900.38	Sanctions Judgment: conduct legal research on imprisonment remedy for civil contempt

McHugh, Brendan P.	Associate	02/13/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze McGuckin's tax returns to determine which entities/medical centers are likely paying him distributions (or otherwise).
McHugh, Brendan P.	Associate	02/13/24	1.7	\$525.00	\$892.50	Sanctions Judgment: Analyze e-mail correspondence from Mr. Joe Argentina regarding possible contempt proceeding in Bankruptcy Court (.3); analyze case law referenced by Mr. Argentina in the same (.6); strategy meeting with Mr. Argentina regarding next steps
Rank, Robin E.	Paralegal	02/14/24	0.1	\$411.30	\$41.13	Communications with R. Longo confirming writ package has been delivered to Northampton Court of Common Pleas
Argentina, Joseph	Counsel	02/14/24	2.2	\$700.00	\$1,540.00	Sanctions Judgment: continue research and drafting for motion for contempt
Imani, Roya	Associate	02/14/24	1.9	\$643.13	\$1,221.94	Sanctions Judgment: conduct legal research on imprisonment remedy for civil contempt
McHugh, Brendan P.	Associate	02/14/24	5.6	\$525.00	\$2,940.00	Sanctions Judgment: Analyze McGuckin's tax returns and financial disclosures for various medical centers/entities owned by McGuckin to determine corporate structure, ownership, profitability, and historical payments to McGuckin from the centers/entities in connection with motion for contempt and charging order against them.
McHugh, Brendan P.	Associate	02/14/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze allegations in DOJ Complaint against McGuckin regarding his ownership over centers/entities (.2); analyze pleadings from McGuckin dispute with Metro Physicians Specialty Group, P.C. regarding the same (.2).
Imani, Roya	Associate	02/15/24	2.7	\$643.13	\$1,736.44	Sanctions Judgment: conduct legal research on imprisonment remedy for civil contempt
McHugh, Brendan P.	Associate	02/15/24	1.7	\$525.00	\$892.50	Sanctions Judgment: Analyze McGuckin's tax returns and financial disclosures for various medical centers/entities owned by McGuckin to determine corporate structure, ownership, profitability, and historical payments to McGuckin from the centers/entities in connection with motion for contempt and charging order against them (.6); detailed e-mail correspondence with Mr. Joe Argentina regarding the same (1.1)
Argentina, Joseph	Counsel	02/16/24	3.9	\$700.00	\$2,730.00	Sanctions Judgment: continue drafting motion for contempt
Argentina, Joseph	Counsel	02/16/24	0.4	\$700.00	\$280.00	Sanctions Judgment: review results of legal research by R. Imani re: contempt
Imani, Roya	Associate	02/16/24	0.8	\$643.13	\$514.50	Sanctions Judgment: email J. Argentina summarizing legal research on imprisonment remedy for civil contempt
McHugh, Brendan P.	Associate	02/16/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Analyze research related to imprisonment as a remedy for contempt (.2); correspondence with Mr. Joe Argentina regarding charging orders on McGuckin
Argentina, Joseph	Counsel	02/20/24	4.8	\$700.00	\$3,360.00	Sanctions Judgment: continue draft of background section for contempt motion
Argentina, Joseph	Counsel	02/20/24	0.7	\$700.00	\$490.00	Sanctions Judgment: telephone conferences with B. McHugh re: possible garnishment of McGuckin's Delaware purported employer
McHugh, Brendan P.	Associate	02/20/24	2.8	\$525.00	\$1,470.00	Sanctions Judgment: Analyze documents produced by McGuckin to determine other entities to possibly be included in motion for contempt/charging order (1.0); analyze publicly available documents concerning ownership of Delaware Vascular Institute LLC (1.2); strategy meeting with Mr. Joe Argentina regarding the same and next steps (.6).
Argentina, Joseph	Counsel	02/21/24	0.3	\$700.00	\$210.00	Sanctions Judgment: confer with client re: motion for contempt
Argentina, Joseph	Counsel	02/21/24	3.1	\$700.00	\$2,170.00	Sanctions Judgment: continue draft of motion for contempt
McHugh, Brendan P.	Associate	02/21/24	0.8	\$525.00	\$420.00	Sanctions Judgment: Analyze financial disclosures from McGuckin-owned entities for motion for contempt purposes (.5); confer with Mr. Joe Argentina regarding the same (.3).
McHugh, Brendan P.	Associate	02/21/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Analyze portions of draft motion for contempt.
McHugh, Brendan P.	Associate	02/22/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze correspondence from Northampton Court regarding entry of appearance and return of service for garnishment upon Lehigh Valley Vascular Institute,
McHugh, Brendan P.	Associate	02/23/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze notice from Delaware County prothonotary's office regarding March 11th hearing.
Rank, Robin E.	Paralegal	02/28/24	0.9	\$411.26	\$370.13	Attention to file maintenance; edit Notice of Appearance; draft filing/service letter to court; draft and send instructions to office services for mailing to court and serving
Coe, Richard E.	Partner	03/01/24	0.3	\$815.00	\$244.50	Conference with J. Argentina re: McGuckin financial issues



Argentina, Joseph	Counsel	03/01/24	3.8	\$700.00	\$2,660.00	Sanctions Judgment: legal research and drafting for motion for contempt
Argentina, Joseph	Counsel	03/05/24	3.6	\$700.00	\$2,520.00	Sanctions Judgment: prepare for hearing in Delaware County foreclosure action: legal research on effect of bankruptcy appeal; revise issue outline drafts; begin draft of cross examination of A. McGuckin; legal research and analysis of potential evidentiary issues
Argentina, Joseph	Counsel	03/05/24	0.5	\$700.00	\$350.00	Sanctions Judgment: prepare for hearing in Delaware County foreclosure action: confer with R. Coe re: judicial notice and other evidentiary issues
Coe, Richard E.	Partner	03/05/24	0.5	\$815.00	\$407.50	Conference with J. Argentina re: foreclosure hearing
Rank, Robin E.	Paralegal	03/06/24	0.8	\$411.25	\$329.00	Communications with J. Argentina regarding documents for hearing; review court website and pull documents stamped filed for J. Argentina
Argentina, Joseph	Counsel	03/06/24	3.6	\$700.00	\$2,520.00	Sanctions Judgment: prepare for hearing in Delaware County foreclosure action: prepare pleadings and authority binders; further legal research on equitable stays of execution writs: revisions to argument outlines
McHugh, Brendan P.	Associate	03/06/24	0.6	\$525.00	\$315.00	Meeting with Mr. Joe Argentina regarding hearing in Delaware County on March 11, 2024 (.2); analyze correspondence related to the same (.4).
Argentina, Joseph	Counsel	03/07/24	0.3	\$700.00	\$210.00	Sanctions Judgment: confer with client regarding foreclosure hearing
Argentina, Joseph	Counsel	03/08/24	0.7	\$700.00	\$490.00	Sanctions Judgment: review and analyze bench memo filed by McGuckin
Argentina, Joseph	Counsel	03/08/24	2.6	\$700.00	\$1,820.00	Sanctions Judgment: prepare for foreclosure hearing: revise opening argument and issues outline; prepare exhibits
Argentina, Joseph	Counsel	03/09/24	5.4	\$700.00	\$3,780.00	Sanctions Judgment: prepare for foreclosure hearing: draft cross examinations of Alison and James McGuckin (3.3); prepare additional exhibits (2.1).
Argentina, Joseph	Counsel	03/10/24	5.2	\$700.00	\$3,640.00	Sanctions Judgment: prepare for foreclosure hearing: revise cross examinations of Alison and James McGuckin (1.1); prepare additional exhibits (.7); revise opening argument and draft closing argument (3.4).
Coe, Richard E.	Partner	03/10/24	0.4	\$815.00	\$326.00	Review and revise cross-examination outlines and send email to J. Argentina re: same
Argentina, Joseph	Counsel	03/11/24	6.6	\$700.00	\$4,620.00	Sanctions Judgment: attend foreclosure hearing in Delaware county and post-hearing conference with R. Coe and B. McHugh (5.8); confer with W. Gardner re: hearing and next steps (.5); review answers to interrogatories by Lehigh Valley Vascular (.3).
Coe, Richard E.	Partner	03/11/24	4.1	\$815.00	\$3,341.50	Attend hearing on motion to stay foreclosure and conferences with J. Argentina and B. McHugh re: same
McHugh, Brendan P.	Associate	03/11/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze Leigh Valley Vascular Institute, LLC's Answers to Interrogatories in Attachment (Northampton County).
Coe, Richard E.	Partner	03/12/24	0.2	\$815.00	\$163.00	Send email to J. Argentina re: findings of fact and conclusions of law
Argentina, Joseph	Counsel	03/13/24	4.4	\$700.00	\$3,080.00	Sanctions Judgment: draft proposed findings of fact, conclusions of law, and order in foreclosure action
McHugh, Brendan P.	Associate	03/13/24	0.8	\$525.00	\$420.00	Analyze requirements for new notice to potential interest holders under Pennsylvania Rules of Civil Procedure should the sheriff's sale move forward.
Argentina, Joseph	Counsel	03/14/24	3.6	\$700.00	\$2,520.00	Sanctions Judgment: Finalize draft of proposed findings of fact and conclusions of law and order (2.2); E-mail correspondence with R. Coe and B. McHugh re: same (.2); review comments to document from B. McHugh (1.2).
McHugh, Brendan P.	Associate	03/14/24	1.5	\$525.00	\$787.50	Sanctions Judgment: Further analyze requirements for new notice of sale requirements under Pennsylvania Rules of Civil Procedure should the sheriff's sale move forward.
McHugh, Brendan P.	Associate	03/14/24	3.1	\$525.00	\$1,627.50	Sanctions Judgment: Review and edit proposed findings of fact and conclusions of law following March 11th hearing (2.4); analyze and edit proposed order to be submitted in connection with the same (.4); correspondence with Mr. Richard Coe and Mr. Joe Argentina regarding the same (.3).
Argentina, Joseph	Counsel	03/15/24	0.8	\$700.00	\$560.00	Sanctions Judgment: analyze notice issues for rescheduled sheriff's sale with B. McHugh

Argentina, Joseph	Counsel	03/15/24	0.8	\$700.00	\$560.00	Sanctions Judgment: revise findings of fact and conclusions of law in light of comments from R. Coe
Coe, Richard E.	Partner	03/15/24	1.3	\$815.00	\$1,059.50	Review and revise findings of fact and conclusions of law and conduct research in support of same
McHugh, Brendan P.	Associate	03/15/24	1.5	\$525.00	\$787.50	Sanctions Judgment: Analyze and edit proposed findings of fact and conclusions of law (.7); meeting with Mr. Joe Argentina regarding the same and other strategic
Argentina, Joseph	Counsel	03/18/24	3.1	\$700.00	\$2,170.00	Sanctions Judgment: finalize order, findings of fact and conclusions of law (research and drafting), and proposed order
Argentina, Joseph	Counsel	03/19/24	0.3	\$700.00	\$210.00	Sanctions Judgment: draft cover letter to Judge Dozer for findings and conclusions
Argentina, Joseph	Counsel	03/19/24	1.3	\$700.00	\$910.00	Sanctions Judgment: finalize findings of fact and conclusions of law in foreclosure action
Argentina, Joseph	Counsel	03/19/24	0.4	\$700.00	\$280.00	Sanctions Judgment: coordinate electronic and hand delivery of findings of fact and conclusions of law to Judge Dozer
Coe, Richard E.	Partner	03/19/24	0.4	\$815.00	\$326.00	Review and revise findings of fact and conclusions of law
McHugh, Brendan P.	Associate	03/19/24	1.2	\$525.00	\$630.00	Sanctions Judgment: Final review of proposed findings of fact and conclusions of law (.8); correspondence with case team regarding the same (.4).
Rank, Robin E.	Paralegal	03/20/24	2.1	\$411.25	\$863.63	Communications with J. Argentina regarding efilng Order, FoF and CoL; attention to filing same; draft Certificate of Service
Argentina, Joseph	Counsel	03/20/24	1.2	\$700.00	\$840.00	Sanctions Judgment: revise findings of fact and conclusions of law and coordinate filing and hand delivery to Judge Dozer's chambers
Argentina, Joseph	Counsel	03/20/24	1.1	\$700.00	\$770.00	Sanctions Judgment: continue draft of motion for contempt
Conroy, Genevieve D.	Paralegal	03/20/24	0.3	\$328.13	\$98.44	Draft email to clerk of court re findings of fact and conclusions of law and coordinating for hand delivery of copies of same to Judge Dozer
McHugh, Brendan P.	Associate	03/20/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Analyze proposed findings of fact and conclusions of law filed by McGuckin.
Argentina, Joseph	Counsel	03/21/24	0.6	\$700.00	\$420.00	Sanctions Judgment: confer with client re: motion for contempt
Argentina, Joseph	Counsel	03/21/24	0.3	\$700.00	\$210.00	Sanctions Judgment: coordinate preparation of damages calculations on motion for discovery sanctions
Argentina, Joseph	Counsel	03/21/24	6.7	\$700.00	\$4,690.00	Sanctions Judgment: legal research and drafting for motion for contempt
Coe, Richard E.	Partner	03/21/24	0.7	\$815.00	\$570.50	Exchange emails re: motion for sanctions hearing and conduct research re: ethics associated with use of private investigator
McHugh, Brendan P.	Associate	03/21/24	0.9	\$525.00	\$472.50	Sanctions Judgment: E-mails with Mr. Richard Coe and Joe Argentina regarding contempt motion and regarding sanctions motion in Montgomery County (.3); analyze McGuckin's DOJ disclosure forms in connection with the same (.6).
Argentina, Joseph	Counsel	03/22/24	7.5	\$700.00	\$5,250.00	Sanctions Judgment: research and drafting for motion for contempt
Argentina, Joseph	Counsel	03/25/24	3.3	\$700.00	\$2,310.00	Sanctions Judgment: draft motion to hold McGuckin in contempt of bankruptcy court
Argentina, Joseph	Counsel	03/25/24	0.5	\$700.00	\$350.00	Sanctions Judgment: confer with W. Gardner re: contempt motion and related issues
Argentina, Joseph	Counsel	03/26/24	5.6	\$700.00	\$3,920.00	Sanctions Judgment: revise motion for contempt, prepare and redact all exhibits, draft Gardner affidavit in support
Argentina, Joseph	Counsel	03/27/24	6.2	\$700.00	\$4,340.00	Sanctions Judgment: further factual and legal research for motion for contempt (review DOJ EDPA filings, Metro documents, interrogatory responses); revise motion for contempt, Gardner declaration and exhibits accordingly
Greer, Cathy M.	Paralegal	03/27/24	0.2	\$428.75	\$85.75	Review Delaware Secretary of State records for Vascular Care Specialists LLC and obtain plain copies of all documents on file
Argentina, Joseph	Counsel	03/28/24	2.6	\$700.00	\$1,820.00	Sanctions Judgment: final proofread and revise motion for contempt and Gardner declaration in support (2.4); email to Gardner with motion package for review (.2)
Argentina, Joseph	Counsel	04/02/24	0.3	\$700.00	\$210.00	Sanctions Judgment: review order denying Alison McGuckin petition to stay foreclosure

McHugh, Brendan P.	Associate	04/02/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Analyze Order entered by Judge Dozer denying Alison McGuckin's petition to stay the sheriff's sale of the Carriage House (.7); correspondence with Messrs. Richard Coe and Joe Argentina regarding the same (.4); analyze return filed on the Montomerv Countv docket (.2) and correspondence with Mr. Joe Argentina regarding
Coe, Richard E.	Partner	04/03/24	0.3	\$815.00	\$244.50	Review order on foreclosure sale and send email to J. Argentina and B. McHugh re: same
McHugh, Brendan P.	Associate	04/03/24	1.2	\$525.00	\$630.00	Sanctions Judgment: Draft letter to Ms. Lori Screibler (Delaware County Sheriff's Office) regarding Judge Dozer's Order instructing that the Carriage House be re-listed for sheriff's sale (.8); analyze order and considerations in connection with the same (.4).
McHugh, Brendan P.	Associate	04/03/24	0.6	\$525.00	\$315.00	Sanctions Judgment: Analyze correspondence from Ms. Lori Schreiber (Delaware County Sheriff's Office) regarding sheriff's sale (.4); follow-up correspondence with Messrs. Richard Coe and Joe Argentina regarding the same (.2).
McHugh, Brendan P.	Associate	04/03/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina (.5); follow up analysis of sheriff sale procedures (.5).
Argentina, Joseph	Counsel	04/04/24	1.3	\$700.00	\$910.00	Sanctions Judgment: E-mail correspondence with client regarding order denying Alison McGuckin's petition to set aside foreclosure writ (.4); confer with B. McHugh regarding next steps with Delco Sheriff's office (.2); calls with client re: foreclosure sale timing and related issues (.4); E-mail correspondence with FDBR personnel re: interactions with Delco
McHugh, Brendan P.	Associate	04/04/24	3.1	\$525.00	\$1,627.50	Sanctions Judgment: Analyze documents required to re-list McGuckin real property for sheriff's sale (.5); strategy call with Mr. Joe Argentina regarding the same (.2) and follow-up e-mails with Mr. Argentina regarding the same (.2); draft and edit praecipe to issue new writ regarding McGuckin real property and writ to filed in connection with the same (.4); draft and edit Rule 3129.1 affidavit to be filed with the same (.4); draft and edit property/legal description to be filed with the same (.3); correspondence and calls with the Delaware County Sheriff's Office regarding the same and prior refund issued (.5); correspondence with Mr. Robin Rank regarding strategy and next steps related to new
Rank, Robin E.	Paralegal	04/05/24	2.4	\$411.25	\$987.00	Communications with B. McHugh regarding revising writ package, recalculating fees and refiling with Delaware County Court; calculate and update fees and interest; revise and edit writ documents and send to B. McHugh for review; communications with R. Longo regard check request, completion of Sheriff's Service Form and preparing writ package to send to Sheriff; efile documents
McHugh, Brendan P.	Associate	04/05/24	2.1	\$525.00	\$1,102.50	Sanctions Judgment: Detailed e-mail correspondence with Ms. Robin Rank regarding sheriff's requirements to re-list the carriage house for sale and analysis of the same (.9); draft and edit required notice of sale (.7) and advertising documents (.5) required by the sheriff's office for the same.
McHugh, Brendan P.	Associate	04/05/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze strategy and next steps for hearing on sanctions motion in Montgomery County and re-listing of property for sale in Delaware County.
McHugh, Brendan P.	Associate	04/05/24	2.5	\$525.00	\$1,312.50	Sanctions Judgment: Draft and finalize praecipe to reissue writ of execution and related documents for filing in Delaware County (1.1); finalize affidavit pursuant to Rule 3129.1 for filing in connection with the same (.5); e-mail correspondence with Ms. Robin Rank regarding the same (.4); e-mail correspondence with Mr. Joe Argentina regarding strategy related to reissued writ (.4); conference call with Delaware County Sheriff's Office
Argentina, Joseph	Counsel	04/06/24	1.0	\$700.00	\$700.00	Sanctions Judgment: review and integrate client edits to motion for contempt and declaration in support (.4); analyze question from client re: jurisdictional statement in motion (.3); E-mail correspondence with client re: same (.3).
Argentina, Joseph	Counsel	04/09/24	0.5	\$700.00	\$350.00	Sanctions Judgment: confer with B. McHugh re: new foreclosure writ and hearing on discovery sanctions motion

McHugh, Brendan P.	Associate	04/09/24	2.0	\$525.00	\$1,050.00	Sanctions Judgment: E-mails with Ms. Robin Rank regarding next steps to have property re-listed for sale by Delaware County Sheriff's Office (1.0); analyze rules of civil procedure applicable to the same (.6); analyze prior correspondence with Sheriff's Office in connection with the same (.4).
McHugh, Brendan P.	Associate	04/09/24	0.6	\$525.00	\$315.00	Sanctions Judgment: Strategy call with Mr. Joe Argentina regarding hearing on Gardner's motion for sanctions in Montgomery County and service strategy for real property sale in Delaware County.
Argentina, Joseph	Counsel	04/10/24	1.8	\$700.00	\$1,260.00	Sanctions Judgment: prepare for hearing on motion for discovery sanctions (review pleadings and prepare files)
Coe, Richard E.	Partner	04/11/24	0.6	\$815.00	\$489.00	Review McGuckin discovery letter and additional financial disclosures and send email to J. Argentina re: same
Argentina, Joseph	Counsel	04/11/24	1.4	\$700.00	\$980.00	Sanctions Judgment: Brief review of email and documents from counsel to McGuckin (.6); confer with B. McHugh re: same and oral argument on motion for discovery sanctions (.8).
Argentina, Joseph	Counsel	04/11/24	2.8	\$700.00	\$1,960.00	Sanctions Judgment: Prepare argument outline for oral argument on discovery sanctions
McHugh, Brendan P.	Associate	04/11/24	1.0	\$525.00	\$525.00	Sanctions Judgment: Analyze production of documents from Bochetto and Lentz.
McHugh, Brendan P.	Associate	04/12/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina.
Rank, Robin E.	Paralegal	04/15/24	0.1	\$411.30	\$41.13	Communications with B. McHugh regarding Notice of Sheriff's Sale
McHugh, Brendan P.	Associate	04/15/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Analyze strategy and next steps for service of notice of sale upon those listed in Rule 3129.1 affidavit and upon Defendants (.6); draft letter to those entities listed in Rule 3129.1 affidavit (.4) and separate cover letter to Mr. David Heim (.4)
Rank, Robin E.	Paralegal	04/16/24	1.0	\$411.25	\$411.25	Communications with B. McHugh regarding letters to D. Heim and A. Belmont; work with Office Services to get letters printed and mailed per instructions from B. McHugh
Argentina, Joseph	Counsel	04/16/24	0.2	\$700.00	\$140.00	Sanctions Judgment: review notices filed in Montgomery County garnishment action
McHugh, Brendan P.	Associate	04/16/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Analyze documents filed on Montgomery County docket by prothonotary (.2); e-mail correspondence with Mr. Joe Argentina regarding the same (.1).
McHugh, Brendan P.	Associate	04/16/24	0.6	\$525.00	\$315.00	Sanctions Judgment: Finalize letters serving notice of sheriff's sale upon Defendants and persons listed in Rule 3129.1 affidavit (.3); correspondence with Ms. Robin Rank regarding the same (.3).
McHugh, Brendan P.	Associate	04/17/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze requirements for Rule 3129.2 affidavit regarding service of notice of sale (.2); draft and edit the same (.2).
McHugh, Brendan P.	Associate	04/18/24	0.5	\$525.00	\$262.50	Analyze Order entered by Judge Eisenberg granting Gardner's request for discovery sanctions (.2); analyze strategy and next steps for the fraudulent transfer action in light of
Coe, Richard E.	Partner	04/19/24	0.3	\$815.00	\$244.50	Conference with J. Argentina re: sanctions order
Argentina, Joseph	Counsel	04/22/24	3.0	\$700.00	\$2,100.00	Sanctions Judgment: Prepare exhibit to affidavit for sanctions award in Montgomery County Court of Common Pleas
McHugh, Brendan P.	Associate	04/22/24	0.9	\$525.00	\$472.50	Sanctions Judgment: Draft Rule 3129.2 affidavit regarding service of the notice of the July 19, 2024 Sheriff's Sale.
McHugh, Brendan P.	Associate	04/24/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Further edit affidavit pursuant to Rule 3129.2.
Argentina, Joseph	Counsel	04/25/24	3.1	\$700.00	\$2,170.00	Sanctions Judgment: finish draft of Gardner affidavit and exhibit in support of discovery sanctions and related email to Gardner with status and instructions
Rank, Robin E.	Paralegal	04/26/24	0.5	\$411.26	\$205.63	Communications with J. Argentina regarding e-filing affidavit and proposed order; review, prepare and efile same in Montgomery County Court of Common Pleas
Argentina, Joseph	Counsel	04/26/24	0.8	\$700.00	\$560.00	Sanctions Judgment: confer with Gardner re: affidavit in support of discovery sanctions (.2); finalize and coordinate filing of Gardner affidavit and exhibits (.6)
Argentina, Joseph	Counsel	04/29/24	0.4	\$700.00	\$280.00	Sanctions Judgment: initial brief review of latest discovery produced by McGuckin and related email correspondence with client

Argentina, Joseph	Counsel	04/29/24	0.6	\$700.00	\$420.00	Sanctions Judgment: finalize letter to Montgomery County CCP re: McGuckin non-compliance with discovery sanctions order (.3); related email and phone conferences with B. McHugh re: filing same (.3).
McHugh, Brendan P.	Associate	04/29/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Strategy call with Mr. Joe Argentina.
McHugh, Brendan P.	Associate	04/29/24	0.7	\$525.00	\$367.50	Sanctions Judgment: Edit letter to Judge Eisenberg's chambers regarding non-compliance with the April 18th Sanctions Order (.5); correspondence with Mr. Joe Argentina regarding the same (.2).
McHugh, Brendan P.	Associate	04/29/24	0.6	\$525.00	\$315.00	Sanctions Judgment: Analyze production of documents made by McGuckin.
Argentina, Joseph	Counsel	04/30/24	0.5	\$700.00	\$350.00	Sanctions Judgment: further review of McGuckin discovery responses
McHugh, Brendan P.	Associate	04/30/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze sheriff sale schedule regarding July 19th sale (.2); correspondence with Ms. Robin Rank regarding the same (.2).
McHugh, Brendan P.	Associate	04/30/24	3.5	\$525.00	\$1,837.50	Sanctions Judgment: Analyze McGuckin's interrogatory responses served on April 29th (.7); analyze documents produced with the same to determine what McGuckin did with the proceeds from the Maine Property Sales in 2023 and other asset dispositions (2.8).
Rank, Robin E.	Paralegal	05/01/24	0.2	\$411.25	\$82.25	Communications with B. McHugh and R. Longo regarding confirmation Delaware County Sheriff received writ package
Argentina, Joseph	Counsel	05/01/24	1.2	\$700.00	\$840.00	Sanctions Judgment: confer with Gardner re: discovery issues (.5); review analysis of discovery documents by B. McHugh (.3); analyze next steps re: discovery and collection
McHugh, Brendan P.	Associate	05/01/24	5.3	\$525.00	\$2,782.50	Sanctions Judgment: Analyze McGuckin's discovery responses served on April 29th (.8); analyze documents produced with the same to determine current assets and asset dispositions (3.0); detailed correspondence with Richard Coe and Joe Argentina regarding
McHugh, Brendan P.	Associate	05/02/24	6.5	\$525.00	\$3,412.50	Sanctions Judgment: Analyze account statements for several dozen accounts at PNC, UBS, and Goldman Sachs.
Argentina, Joseph	Counsel	05/03/24	1.4	\$700.00	\$980.00	Sanctions Judgment: review and analyze summary of bank account activity from B. McHugh (.7); review Alison McGuckin notice of appeal and related order from Judge Dozer (.3); confer with B. McHugh re: same (.4)
McHugh, Brendan P.	Associate	05/03/24	1.3	\$525.00	\$682.50	Sanctions Judgment: Finalize analysis of account statements for McGuckin's accounts at PNC, UBS, and Goldman Sachs (1.0); correspondence with Mr. Joe Argentina and Mr. Richard Coe regarding the same (.3).
McHugh, Brendan P.	Associate	05/03/24	1.2	\$525.00	\$630.00	Sanctions Judgment: Analyze documents produced by McGuckin related to insurance policies and loan applications.
McHugh, Brendan P.	Associate	05/03/24	0.8	\$525.00	\$420.00	Sanctions Judgment: Analyze notice of appeal filed by Allison McGuckin in the Delaware County collection action (.3); analyze Judge Dozer's opinion regarding the same (.3); correspondence with Mr. Rick Coe and Mr. Joe Argentina regarding the same (.2).
McHugh, Brendan P.	Associate	05/03/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Strategy call with Mr. Joe Argentina regarding appeal and discovery deficiencies.
Rank, Robin E.	Paralegal	05/06/24	0.1	\$411.30	\$41.13	Communications with J. Argentina regarding Delaware County efilings
Argentina, Joseph	Counsel	05/06/24	1.1	\$700.00	\$770.00	Sanctions Judgment: analyze practical value and procedural issues in seeking imprisonment vs judgment against McGuckin and wife and confer with B. McHugh re:
Argentina, Joseph	Counsel	05/06/24	0.5	\$700.00	\$350.00	Sanctions Judgment: E-mail correspondence with client re: notice of appeal of order denying stay of foreclosure sale (.1); confer with client re: same (.4).
Argentina, Joseph	Counsel	05/06/24	5.9	\$700.00	\$4,130.00	Sanctions Judgment: review documents produced by McGuckin and draft letter to Judge Eisenberg re: non-compliance with sanctions order (5.5); confer with client re: same (.4)
McHugh, Brendan P.	Associate	05/06/24	2.0	\$525.00	\$1,050.00	Sanctions Judgment: Strategy call with Mr. Joe Argentina regarding appeal from Judge Dozer's order in Delaware County and next steps in Montgomery County (.6); analyze Superior Court dockets to determine whether appeal has been docketed (.3); further review and analyze McGuckin's production on April 29th in connection with the same

Argentina, Joseph	Counsel	05/07/24	0.4	\$700.00	\$280.00	Sanctions Judgment: confer with B. McHugh re: foreclosure sale and other collection
Argentina, Joseph	Counsel	05/07/24	4.4	\$700.00	\$3,080.00	Sanctions Judgment: further research and drafting of letter and exhibits to Montgomery County Court of Common Pleas regarding McGuckin failure to obey Sanctions Order
Argentina, Joseph	Counsel	05/07/24	1.0	\$700.00	\$700.00	Sanctions Judgment: confer with R. Coe and B. McHugh re: collection options and strategy
Coe, Richard E.	Partner	05/07/24	1.3	\$815.00	\$1,059.50	Review McGuckin discovery responses and emails from B. McHugh summarizing same; conference with J. Argentina and B. McHugh re: same and next steps in collection actions
Argentina, Joseph	Counsel	05/07/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with PA superior court re: appeal docketing (.1); review notice of appeal received by US mail from counsel to Alison McGuckin (.1).
McHugh, Brendan P.	Associate	05/07/24	1.0	\$525.00	\$525.00	Sanctions Judgment: Draft and edit analysis of McGuckin account statements to be sent to Whit Gardner (.4); analyze statements in connection with the same (.6).
McHugh, Brendan P.	Associate	05/07/24	1.7	\$525.00	\$892.50	Sanctions Judgment: Meeting with Rick Coe and Joe Argentina regarding strategy and next steps for collection actions (1.0); follow-up meeting with Mr. Joe Argentina regarding the same (.3); prepare for the same by analyzing strategic considerations regarding moving for summary judgment in the fraudulent transfer action and related motions (.4).
McHugh, Brendan P.	Associate	05/07/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Analyze correspondence from Superior Court prothonotary regarding Allison McGuckin's appeal (.4); e-mail correspondence to Mr. Joe Argentina regarding the same (.1).
Argentina, Joseph	Counsel	05/08/24	3.8	\$700.00	\$2,660.00	Sanctions Judgment: finalize first draft of letter to Montgomery County Court and exhibits; redact exhibits; legal research for letter; analyze potential arguments regarding bank
Argentina, Joseph	Counsel	05/08/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with client re: McGuckin production
McHugh, Brendan P.	Associate	05/08/24	2.3	\$525.00	\$1,207.50	Sanctions Judgment: Analyze debits and credits in account statements for McGuckin's joint account ending in 9549 (1.1); analyze case law and procedural rules regarding Allison McGuckin's ability to seek a stay from the Superior Court (1.2).
McHugh, Brendan P.	Associate	05/09/24	1.1	\$525.00	\$577.50	Sanctions Judgment: Finalize affidavit pursuant to Rule 3129.2 necessary for sheriff's sale of McGuckin's real property.
McHugh, Brendan P.	Associate	05/09/24	2.2	\$525.00	\$1,155.00	Sanctions Judgment: Analyze documents produced by McGuckin in connection with the
Argentina, Joseph	Counsel	05/10/24	0.1	\$700.00	\$70.00	E-mail correspondence with client re: McGuckin production files
Argentina, Joseph	Counsel	05/10/24	0.7	\$700.00	\$490.00	Sanctions Judgment: review letter to Montgomery County Court and exhibits (.6); related email correspondence with client (.1)
McHugh, Brendan P.	Associate	05/10/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Analyze case law and rules regarding whether a stay of execution can be sought from the appellate court.
Argentina, Joseph	Counsel	05/13/24	0.5	\$700.00	\$350.00	Sanctions Judgment: coordinate delivery of McGuckin discovery files to Gardner personnel
Argentina, Joseph	Counsel	05/13/24	0.6	\$700.00	\$420.00	Sanctions Judgment: review briefing schedule and case order in PA Superior Court appeal of foreclosure order (.3); confer with B. McHugh re: same (.3)
Argentina, Joseph	Counsel	05/13/24	0.3	\$700.00	\$210.00	Sanctions Judgment: confer with Gardner re: edits to Montgomery county letter
Argentina, Joseph	Counsel	05/13/24	0.2	\$700.00	\$140.00	E-mail correspondence with R. Coe re: letter to Montgomery County
Coe, Richard E.	Partner	05/13/24	0.6	\$815.00	\$489.00	Review and revise letter to Montgomery County judge and exchange emails re: same
McHugh, Brendan P.	Associate	05/13/24	1.2	\$525.00	\$630.00	Sanctions Judgment: Analyze correspondence from Mr. Richard Coe and Joe Argentina regarding McGuckin's ability to pay (.2); analyze correspondence from Superior Court regarding briefing and related deadlines (.4); analyze Superior Court docket to determine Gardner's procedural obligations, if any, regarding the trial court record (.2); analyze Rules of Appellate Procedure regarding the same (.4)
McHugh, Brendan P.	Associate	05/13/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Strategy call with Mr. Joe Argentina regarding next steps related to McGuckin's non-compliance with Judge Eisenberg's order entered in Montgomery County.
McHugh, Brendan P.	Associate	05/13/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze exhibits to be appended to letter to Judge Eisenberg.
Argentina, Joseph	Counsel	05/14/24	1.1	\$700.00	\$770.00	Sanctions Judgment: incorporate client comments into letter to Montgomery county

Argentina, Joseph	Counsel	05/14/24	2.8	\$700.00	\$1,960.00	Sanctions Judgment: detailed review of McGuckin bank statements and revisions to letter to Montgomery county
McHugh, Brendan P.	Associate	05/14/24	2.8	\$525.00	\$1,470.00	Sanctions Judgment: Analyze account statements for McGuckin's PNC accounts to argue about his opulent lifestyle (1.7); prepare written analysis of his ATM withdrawals at the Valley Forge Casino (.8); correspondence with Mr. Joe Argentina and Mr. Richard Coe
McHugh, Brendan P.	Associate	05/14/24	0.8	\$525.00	\$420.00	Sanctions Judgment: Analyze McGuckin's use of funds in PNC accounts held jointly with
Argentina, Joseph	Counsel	05/15/24	4.0	\$700.00	\$2,800.00	Sanctions Order: multiple revisions to Montgomery County letter and conferences with client re: same (3.8); coordinate filing and service of same (.2)
Coe, Richard E.	Partner	05/15/24	0.7	\$815.00	\$570.50	Review revised draft of letter to Montgomery County Court and conference with J. Argentina re: same
McHugh, Brendan P.	Associate	05/15/24	0.8	\$525.00	\$420.00	Sanctions Judgment: Finalize affidavit of service regarding notice of sale for filing on May 20, 2024.
McHugh, Brendan P.	Associate	05/15/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Draft and edit cover letter to Ms. Lori Schreiber (Delaware County Sheriff) serving Rule 3129.2 Affidavit.
McHugh, Brendan P.	Associate	05/15/24	1.6	\$525.00	\$840.00	Sanctions Judgment: Finalize exhibits to be appended to the same (.4); further analyze account statements and production in connection with the same (1.2).
Argentina, Joseph	Counsel	05/16/24	0.4	\$700.00	\$280.00	Sanctions Judgment: review as-filed letter to Montgomery County and related email correspondence with FDBR personnel re: filing and service
Bonsell, Kaitlyn E.	Paralegal	05/16/24	1.6	\$350.00	\$560.00	Revise letter and serve to chambers.
McHugh, Brendan P.	Associate	05/16/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Research and analyze rules, procedures, and requirements related to a sheriff's sale of real property in Delaware County, Pa.
McHugh, Brendan P.	Associate	05/16/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Finalize letter to Judge Eisenberg regarding McGuckin's non-compliance with the Court's April 18th Order (.5); correspondence with Ms. Kaitlyn Bonsell and Joe Argentina regarding the same (.5); conference calls to chambers (.2) and the Montgomery County prothonotary's office (.2) regarding submission of the same.
McHugh, Brendan P.	Associate	05/17/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Correspondence with Ms. Robin Rank regarding affidavit of service of notice of sale.
McHugh, Brendan P.	Associate	05/17/24	1.6	\$525.00	\$840.00	Sanctions Judgment: Further analyze rules of civil procedure regarding sheriff's sale process (1.2); analyze deficiency judgment act's requirements in connection with the same
Argentina, Joseph	Counsel	05/20/24	1.2	\$700.00	\$840.00	Sanctions Judgment: review Alison McGuckin petition for a stay pending appeal (.6); confer with B. McHugh re: same (.6).
McHugh, Brendan P.	Associate	05/20/24	0.6	\$525.00	\$315.00	Sanctions Judgment: Analyze and formulate strategy for potential charging order against
McHugh, Brendan P.	Associate	05/20/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Analyze emergency motion for stay of July 19th sheriff's sale filed by Allison McGuckin.
McHugh, Brendan P.	Associate	05/20/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Further edit Rule 3129.2 Affidavit (.2); e-mail executed version of the same to Ms. Robin Rank for filing (.2).
McHugh, Brendan P.	Associate	05/20/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina regarding Allison McGuckin's emergency motion for a stay of the July 19th sheriff's sale.
Rank, Robin E.	Paralegal	05/21/24	1.5	\$411.25	\$616.88	Prepare and file affidavit pursuant to Rule 3129.2, exhibits and certificate of service; prepare letter, affidavit of service and exhibits to mail to Delaware County Delaware County Sheriff's office; email same to Delaware County Sheriff's office
Argentina, Joseph	Counsel	05/21/24	0.4	\$700.00	\$280.00	Sanctions Judgment: review and analyze docketing statement from Alison McGuckin
Argentina, Joseph	Counsel	05/21/24	0.7	\$700.00	\$490.00	Sanctions Judgment: conferences with B. McHugh re: appellate scheduling issues, arguments in response to stay motion, finality of DE CCP order, other case issues
Argentina, Joseph	Counsel	05/21/24	1.8	\$700.00	\$1,260.00	Sanctions Judgment: legal research and analysis re: whether DE CCP order denying Alison McGuckin's petition is "final" for appellate purposes
Argentina, Joseph	Counsel	05/21/24	0.3	\$700.00	\$210.00	Sanctions Judgment: confer with client regarding status of appeal and next steps

McHugh, Brendan P.	Associate	05/21/24	1.7	\$525.00	\$892.50	Sanctions Judgment: Research and analyze whether denial of an application to stay a sheriff's sale "determines the disposition of [] property" pursuant to Pa. R.A.P. 1733.
McHugh, Brendan P.	Associate	05/21/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Analyze emergency motion for stay pending appeal filed by Allison McGuckin (.6); analyze case law and authority cited in the same (.8).
McHugh, Brendan P.	Associate	05/21/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Finalize letter to Lori Schreiber (Delaware County Sheriff's Office) serving Rule 3129.2 affidavit and e-mail correspondence regarding the same.
McHugh, Brendan P.	Associate	05/21/24	1.2	\$525.00	\$630.00	Sanctions Judgment: Analyze hearing transcript from 3/10/2024 in connection with arguments made in her emergency motion for stay pending appeal.
McHugh, Brendan P.	Associate	05/21/24	0.7	\$525.00	\$367.50	Sanctions Judgment: Strategy meetings with Mr. Joe Argentina regarding Allison McGuckin's emergency petition pending appeal and the appeal itself.
McHugh, Brendan P.	Associate	05/21/24	0.8	\$525.00	\$420.00	Sanctions Judgment: Analyze local rules and procedures for disposition of an emergency motion (.4); e-mail correspondence to Mr. Joe Argentina regarding the same (.4).
McHugh, Brendan P.	Associate	05/21/24	0.7	\$525.00	\$367.50	Sanctions Judgment: Analyze the civil docketing statement filed by Allison McGuckin in connection with her appeal (.3); analyze case law cited in the same (.4).
McHugh, Brendan P.	Associate	05/21/24	0.7	\$525.00	\$367.50	Sanctions Judgment: Analyze whether Judge Dozer's April 2, 2024 Order is a final order and properly appealed.
Argentina, Joseph	Counsel	05/22/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with Delaware County Court of Common Pleas re: answer to motion for stay pending appeal
Argentina, Joseph	Counsel	05/22/24	0.7	\$700.00	\$490.00	Sanctions Judgment: begin draft response to motion for stay pending appeal
Argentina, Joseph	Counsel	05/22/24	0.3	\$700.00	\$210.00	Sanctions Judgment: telephone conference with client re: status of motion for stay pending appeal
Coe, Richard E.	Partner	05/22/24	0.5	\$815.00	\$407.50	Review motion to stay execution pending appeal and conference with A. Hickok re: proposed response
McHugh, Brendan P.	Associate	05/22/24	4.1	\$525.00	\$2,152.50	Sanctions Judgment: Research and analyze whether a motion for stay pending appeal of an order denying stay is substantively or procedurally permitted/proper (1.3); research and analyze standard and proof-related burdens associated with the same (.6); research and analyze whether general legal principles or equitable principles could be argued to preclude it (1.8); draft and send e-mail to Mr. Joe Argentina regarding the same (4).
McHugh, Brendan P.	Associate	05/22/24	0.7	\$525.00	\$367.50	Sanctions Judgment: Analyze e-mail correspondence from Mr. Joe Argentina regarding whether Judge Dozer's April 2nd Order is a final order for purposes of appeal (.3); respond to the same with additional analysis of relevant case law (.4).
Argentina, Joseph	Counsel	05/23/24	0.6	\$700.00	\$420.00	Sanctions Judgment: confer with B. McHugh re: response to stay motion
Argentina, Joseph	Counsel	05/23/24	1.1	\$700.00	\$770.00	Sanctions Judgment: continue research and draft for response to stay motion
Argentina, Joseph	Counsel	05/23/24	0.4	\$700.00	\$280.00	Sanctions Judgment: confer with Gardner re: payoff request and response to stay motion
Argentina, Joseph	Counsel	05/23/24	0.8	\$700.00	\$560.00	Sanctions Judgment: analyze waiver issues in payoff letter and confer with R. Coe re: same
Argentina, Joseph	Counsel	05/23/24	1.2	\$700.00	\$840.00	Sanctions Judgment: legal research regarding costs and fees in execution under PA law
Argentina, Joseph	Counsel	05/23/24	0.7	\$700.00	\$490.00	Sanctions Judgment: review request for payoff and draft response letter
Coe, Richard E.	Partner	05/23/24	0.3	\$815.00	\$244.50	Conferences with J. Argentina re: payoff letter request and stay pending appeal
McHugh, Brendan P.	Associate	05/23/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Analyze transcript from March 10th hearing for testimony regarding use of the carriage house (.3); correspondence to Mr. Joe Argentina regarding the same
McHugh, Brendan P.	Associate	05/23/24	1.2	\$525.00	\$630.00	Sanctions Judgment: Analyze strategy for payoff letter requested by McGuckin's counsel (.4); analyze whether costs and attorneys' fees related to collection are properly included in the same (.8).
McHugh, Brendan P.	Associate	05/23/24	0.6	\$525.00	\$315.00	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina regarding next steps.
McHugh, Brendan P.	Associate	05/23/24	1.1	\$525.00	\$577.50	Sanctions Judgment: Analyze record designation and statement of issues filed by Allison McGuckin with the Superior Court (.8); e-mail correspondence with Mr. Joe Argentina and Mr. Richard Coe regarding the same (.3).



Rank, Robin E.	Paralegal	05/24/24	0.5	\$411.26	\$205.63	Communications with B. McHugh and J. Argentina regarding May 21, 2024 filing; review court docket; telephone call with court regarding same
Argentina, Joseph	Counsel	05/24/24	0.6	\$700.00	\$420.00	Sanctions Judgment: draft email to Delaware County CCP re: possible settlement
Argentina, Joseph	Counsel	05/24/24	0.4	\$700.00	\$280.00	Sanctions Judgment: finalize and deliver payoff letter
McHugh, Brendan P.	Associate	05/24/24	0.6	\$525.00	\$315.00	Sanctions Judgment: Correspondence with Ms. Robin Rank regarding Rule 3129.2 affidavit (.2); analyze strategy and next steps regarding record designation for Allison McGuckin's appeal (.2) and emergency motion to stay sheriff's sale pending appeal (.2).
Argentina, Joseph	Counsel	05/28/24	1.8	\$700.00	\$1,260.00	Sanctions Judgment: Continue draft of answer to motion for stay pending appeal
Argentina, Joseph	Counsel	05/28/24	0.5	\$700.00	\$350.00	Sanctions Judgment: review email from McGuckin re: creditor problems and confer with client re: same
McHugh, Brendan P.	Associate	05/28/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze correspondence from Ms. Ashley Padley (Judge Dozer's Judicial Assistant) regarding timing of Gardner's response to Allison McGuckin's emergency motion for stay pending appeal (.1); correspondence with Ms. Robin Rank regarding Rule 3129.2 affidavit of service of notice of sale upon required parties (.1).
Argentina, Joseph	Counsel	05/29/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with Delaware County Court of Common Pleas re: stay motion and response
Argentina, Joseph	Counsel	05/29/24	1.9	\$700.00	\$1,330.00	Sanctions Judgment: develop potential settlement proposal (1.2); confer with client re:
Rank, Robin E.	Paralegal	05/29/24	0.2	\$411.25	\$82.25	Review and download file stamped court pleadings; attention to file maintenance
Coe, Richard E.	Partner	05/29/24	0.3	\$815.00	\$244.50	Exchange emails with J. Argentina re: settlement proposals
McHugh, Brendan P.	Associate	05/30/24	1.8	\$525.00	\$945.00	Sanctions Judgment: Research and analyze whether any further actions are required in advance of the July 19th sheriff's sale of McGuckin's carriage house.
McHugh, Brendan P.	Associate	05/30/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Correspondence with Mr. Joe Argentina regarding hearing transcript for answer to Allison McGuckin's emergency motion to stay the July 19th Sheriff's sale.
Argentina, Joseph	Counsel	05/31/24	0.6	\$700.00	\$420.00	Sanctions Judgment: review McHugh analysis of need for further notice of July foreclosure sale (.3); Confer with McHugh re: same (.3)
Argentina, Joseph	Counsel	05/31/24	4.6	\$700.00	\$3,220.00	Sanctions Judgment: continue research and drafting for answer to motion for stay
Argentina, Joseph	Counsel	05/31/24	0.4	\$700.00	\$280.00	Sanctions Judgment: confer with R. Coe re: status of McGuckin settlement (.3); email to counsel to McGuckin re: settlement (.1).
Rank, Robin E.	Paralegal	05/31/24	0.4	\$411.25	\$164.50	Communications with B. McHugh regarding mailing to J. McGuckin; prepare instructions for Office Services to print and mail Notice of Sale to J. McGuckin via certified mail, signed return receipt
McHugh, Brendan P.	Associate	05/31/24	1.1	\$525.00	\$577.50	Sanctions Judgment: E-mail correspondence with Mr. Joe Argentina regarding notice of sale strategy and service requirements under applicable rules (.7); e-mail correspondence with Ms. Robin Rank regarding service of notice of sale upon McGuckin directly (.4).
McHugh, Brendan P.	Associate	05/31/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Further research and analyze sheriff sale procedures, requirements, and practical considerations.
McHugh, Brendan P.	Associate	05/31/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Strategy call with Mr. Joe Argentina.
McHugh, Brendan P.	Associate	06/03/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze strategy and next steps re: service of notice of sale upon McGuckin directly.
McHugh, Brendan P.	Associate	06/03/24	1.7	\$525.00	\$892.50	Sanctions Judgment: Analyze specific requirements for Gardner during sheriff's sale on July 19, 2024.
Argentina, Joseph	Counsel	06/04/24	0.2	\$700.00	\$140.00	Sanctions Judgment: call with B. McHugh re: foreclosure sale preparations
McHugh, Brendan P.	Associate	06/04/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina re: answer to Allison McGuckin's emergency petition to stay July 19th sale pending appeal.
McHugh, Brendan P.	Associate	06/04/24	2.0	\$525.00	\$1,050.00	Sanctions Judgment: Research and analyze statutes and case law re: sheriff's commission for sale of real property (1.5); draft e-mail to Mr. Joe Argentina re: the same (.5).

McHugh, Brendan P.	Associate	06/05/24	3.6	\$525.00	\$1,890.00	Sanctions Judgment: Research and analyze poundage considerations when real property is sold to an executing creditor for costs (1.4); analyze case law re: whether the sheriff can charge poundage even if a settlement is reached prior to judicial sale (1.7); detailed e-mail correspondence with Mr. Joe Argentina re: the same (.5).
Argentina, Joseph	Counsel	06/06/24	4.2	\$700.00	\$2,940.00	Sanctions Judgment: continue research and drafting for answer to motion for stay
Argentina, Joseph	Counsel	06/06/24	0.2	\$700.00	\$140.00	Sanctions Judgment: review McHugh's analysis of sheriff poundage issue related to foreclosure sale
McHugh, Brendan P.	Associate	06/06/24	1.1	\$525.00	\$577.50	Sanctions Judgment: Further analyze practical considerations surrounding sheriff's poundage and strategy in light of the same.
Argentina, Joseph	Counsel	06/07/24	1.1	\$700.00	\$770.00	Sanctions Judgment: continue research and drafting answer to petition for stay
Argentina, Joseph	Counsel	06/10/24	0.3	\$700.00	\$210.00	Sanctions Judgment: review new filing on Montgomery county docket (.1); telephone conference with Judge Eisenberg's chambers re: further orders on discovery sanctions (.2)
McHugh, Brendan P.	Associate	06/10/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze notice of returned Rule 236 notice filed by prothonotary in Montgomery County action.
McHugh, Brendan P.	Associate	06/10/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze status of service of notice of sheriff's sale upon McGuckin by certified mail.
Argentina, Joseph	Counsel	06/11/24	1.9	\$700.00	\$1,330.00	Sanctions Judgment: further research and drafting for answer to motion for stay
McHugh, Brendan P.	Associate	06/11/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Analyze strategy and next steps re: service of the notice of sale upon McGuckin directly.
Argentina, Joseph	Counsel	06/12/24	2.3	\$700.00	\$1,610.00	Sanctions Judgment: prepare exhibits for answer to motion for stay and further edits to the answer itself
Argentina, Joseph	Counsel	06/12/24	0.2	\$700.00	\$140.00	E-mail correspondence with Judge Eisenberg's chambers re: status conference
McHugh, Brendan P.	Associate	06/12/24	1.1	\$525.00	\$577.50	Sanctions Judgment: Analyze status of mail service of notice of sale upon McGuckin (.3) analyze signature requirements related to the same (.4); analyze strategy re: the same to avoid service-related arguments by McGuckin (.4).
Argentina, Joseph	Counsel	06/13/24	0.4	\$700.00	\$280.00	Sanctions Judgment: Telephone conference with B. McHugh re: service issues related to foreclosure sale
Argentina, Joseph	Counsel	06/13/24	2.8	\$700.00	\$1,960.00	Sanctions Judgment: review Movant's cases on irreparable harm and edit answer to motion to stay
McHugh, Brendan P.	Associate	06/13/24	1.1	\$525.00	\$577.50	Sanctions Judgment: Analyze strategy and next steps re: collections, including proof of service of the notice of sale upon McGuckin directly (.7); strategy call with Mr. Joe Argentina re: the same (.4).
Argentina, Joseph	Counsel	06/14/24	0.8	\$700.00	\$560.00	Sanctions Judgment: review and analyze correspondence from counsel to McGuckins to Delaware County Court re: potential settlement and timing of foreclosure proceedings; related email correspondence with client re: same
Argentina, Joseph	Counsel	06/17/24	0.4	\$700.00	\$280.00	Sanctions Judgment: email correspondence with client re: foreclosure issues and strategy
Argentina, Joseph	Counsel	06/17/24	1.6	\$700.00	\$1,120.00	Sanctions Judgment: finalize draft and exhibits for answer to motion for stay pending
Coe, Richard E.		06/17/24	0.2	\$815.00	\$163.00	Review draft of opposition to motion to stay
McHugh, Brendan P.	Associate	06/17/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Strategy call with Mr. Joe Argentina.
Argentina, Joseph	Counsel	06/18/24	4.1	\$700.00	\$2,870.00	Draft response to A. McGuckin settlement motion
Coe, Richard E.	Partner	06/18/24	0.6	\$815.00	\$489.00	Review and revise opposition to motion to stay foreclosure sale and send email to J. Argentina re: same
McHugh, Brendan P.	Associate	06/18/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze scheduling order signed by Judge Dozer; e-mail to case team re: the same.
Argentina, Joseph	Counsel	06/19/24	0.2	\$700.00	\$140.00	Telephone conference with R. Coe re: limited objection to McGuckin settlement motion

Argentina, Joseph	Counsel	06/19/24	4.8	\$700.00	\$3,360.00	Sanctions Judgment: review proposed revisions to answer to Motion for stay pending appeal and incorporate same; further revisions (4.1); coordinate citation checking by paralegal (.2); related email with client (.1); revise exhibits (.4).
Coe, Richard E.	Partner	06/19/24	0.3	\$815.00	\$244.50	Review objection to McGuckin settlement and conference with J. Argentina re: same
McHugh, Brendan P.	Associate	06/19/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze whether Rule 3129.2 affidavit of sale notice should be amended prior to July 19th sale.
Argentina, Joseph	Counsel	06/20/24	1.4	\$700.00	\$980.00	Sanctions Judgment: review pleadings in advance of call with Judge Eisenberg on order for discovery sanctions
Bonsell, Kaitlyn E.	Paralegal	06/20/24	1.4	\$350.00	\$490.00	Revise answer to Motion for Stay.
McHugh, Brendan P.	Associate	06/20/24	0.8	\$525.00	\$420.00	Sanctions Judgment: Strategy call with Mr. Joe Argentina re: Answer to Allison McGuckin's emergency motion for stay pending appeal (.2); analyze exhibits to the same in connection with the same (.6).
McHugh, Brendan P.	Associate	06/20/24	0.6	\$525.00	\$315.00	Sanctions Judgment: Analyze docketing statement filed by Allison McGuckin in connection with her pending appeal (.2); analyze case law cited as the basis for the same in preparation for briefing (.4).
Coe, Richard E.	Partner	06/21/24	0.4	\$815.00	\$326.00	Send emails to J. Argentina re: Goldman account in preparation for sanctions hearing (0.2 hours); conference with J. Argentina re: same (0.2 hours)
Argentina, Joseph	Counsel	06/21/24	4.1	\$700.00	\$2,870.00	Sanctions Judgment: Prepare for and attend hearing on motion for discovery sanctions (2.8); post-hearing calls with client, FDBR team (1.3).
Argentina, Joseph	Counsel	06/21/24	0.3	\$700.00	\$210.00	Sanctions Judgment: review Delaware County Sheriff return of service and confer with B. McHugh re: same
Argentina, Joseph	Counsel	06/21/24	1.2	\$700.00	\$840.00	Sanctions Judgment: review citation check and other edits to answer to motion for stay pending appeal by K. Bonsell (1.1); related email correspondence with W. Gardner (.1).
Argentina, Joseph	Counsel	06/21/24	0.8	\$700.00	\$560.00	Sanctions Judgment: analyze next steps in potential McGuckin refinancing/settlement and confer with Gardner re: same
Argentina, Joseph	Counsel	06/21/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with M. Taticchi re: appeals next steps
Bonsell, Kaitlyn E.	Paralegal	06/21/24	2.0	\$350.00	\$700.00	Revise answer to Motion for Stay.
McHugh, Brendan P.	Associate	06/21/24	1.9	\$525.00	\$997.50	Sanctions Judgment: Strategy meetings with Mr. Joe Argentina re: conference with Judge Eisenberg (MontCo) (.8); analyze publicly available information about Goldman's Vintage Funds in preparation for the same (.8); correspondence with Mr. Joe Argentina re: the
Argentina, Joseph	Counsel	06/24/24	0.6	\$700.00	\$420.00	Sanctions Judgment: review and integrate client comments to answer to motion for stay (.4); email and phone conferences with client re: same (.2).
Argentina, Joseph	Counsel	06/24/24	0.4	\$700.00	\$280.00	Sanctions Judgment: initial review of A. McGuckin appellate brief
Argentina, Joseph	Counsel	06/24/24	1.8	\$700.00	\$1,260.00	Review and revise draft proposed order on McGuckin settlement (.8); confer with client re: same (.3); review and analyze further edits to proposed order by counsel to trustee (.4); confer with counsel to Trustee re: same (.3).
McHugh, Brendan P.	Associate	06/24/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Analyze practical considerations and strategy for sheriff's sale on July 19, 2024 (1.4).
Coe, Richard E.	Partner	06/25/24	0.3	\$815.00	\$244.50	Exchange emails with J. Argentina and A. Hickok re: appeal
Argentina, Joseph	Counsel	06/25/24	1.9	\$700.00	\$1,330.00	Sanctions Judgment: review appellate rules on briefing (.9); review appellate docket and court filings in appeal of Delaware CCP order denying petition for stay (.4); manage critical date calendar (.2); confer with B. McHugh re: appellant brief and responses (.4).
McHugh, Brendan P.	Associate	06/26/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Analyze sheriff sale listing on sheriff's website (.3); analyze correspondence from Delaware County Sheriff's office re: sale (.3); analyze applicable rules in connection with the same (.3); analyze sale-related documents in connection with

McHugh, Brendan P.	Associate	06/27/24	0.9	\$525.00	\$472.50	Sanctions Judgment: Analyze Rule 236 notice from the Delaware County Court of Commons Pleas and correspondence with Joe Argentina re: the same (.3); analyze poundage rules and procedures in advance of July 19th sale and strategy re: the same (.6).
Argentina, Joseph	Counsel	06/28/24	0.3	\$700.00	\$210.00	Sanctions Judgment: confer with client re: status of McGuckin settlement
Bonsell, Kaitlyn E.	Paralegal	07/01/24	1.0	\$350.00	\$350.00	Finalize and prepare Answer to Motion to Stay in Delaware County for filing.
Argentina, Joseph	Counsel	07/01/24	0.4	\$700.00	\$280.00	Sanctions Judgment: E-mail correspondence with McGuckin counsel re: settlement (.2); coordinate preparations for filing and service of answer to motion for stay pending appeal
McHugh, Brendan P.	Associate	07/01/24	0.6	\$525.00	\$315.00	Sanctions Judgment: Strategy call with Mr. Joe Argentina regarding payment and Allison McGuckin's emergency motion to stay pending appeal (.4); analyze e-mails from Albert Belmont and David Heim in connection with the same (.2).
McHugh, Brendan P.	Associate	07/01/24	1.7	\$525.00	\$892.50	Sanctions Judgment: Analyze procedural rules, case law, and practical considerations associated with rescheduling a sheriff's sale (1.0); e-mail correspondence with Mr. Joe Argentina regarding the same (.4); analyze answer to Allison McGuckin's emergency petition to stay sheriff's sale and exhibits to the same (.3).
Argentina, Joseph	Counsel	07/02/24	2.2	\$700.00	\$1,540.00	Sanctions Judgment: review and modify final filings for objection to motion for stay pending appeal and coordinate filing and service of same (1.9); E-mail correspondence with Judge Dozer chambers and client re: settlement and litigation (.3)
Bonsell, Kaitlyn E.	Paralegal	07/02/24	1.2	\$350.00	\$420.00	Revise and prepare courtesy copies of Answer to Motion to Stay.
McHugh, Brendan P.	Associate	07/02/24	1.5	\$525.00	\$787.50	Sanctions Judgment: Analyze correspondence from Mr. Al Belmont regarding status of payment and proceeding forward with Allison McGuckin's motion for stay pending appeal (.2); analyze e-mail correspondence from Court regarding the same (.2); review and analyze Garnder's answer to Ms. McGuckin's motion for filing (.7); confer with Ms. Kaitlyn Bonsell regarding the same (.2); correspondence with Mr. Joe Argentina regarding the
McHugh, Brendan P.	Associate	07/03/24	0.8	\$525.00	\$420.00	Sanctions Judgment: Analyze strategy and next steps for Allison McGuckin's appeal of Judge Dozer's Order entered on April 2, 2024.
McHugh, Brendan P.	Associate	07/03/24	0.8	\$525.00	\$420.00	Sanctions Judgment: Analyze sale procedures and considerations for July 19th sale.
Argentina, Joseph	Counsel	07/08/24	0.7	\$700.00	\$490.00	Sanctions Judgment: review and analyze Alison McGuckin appellate brief in foreclosure
Argentina, Joseph	Counsel	07/08/24	1.0	\$700.00	\$700.00	Sanctions Judgment: confer with A. Hickock re: appellate brief in foreclosure action
Hickok, D. Alicia		07/08/24	2.6	\$888.13	\$2,309.13	SANCTIONS JUDGMENT: Read appellant brief and part of reproduced record; call with J. Argentina.
McHugh, Brendan P.	Associate	07/08/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Strategy call with Mr. Joe Argentina regarding July 16th hearing and appeal (.3); analyze requirements for and process for sheriff's sale and develop strategy for the same (1.1).
Argentina, Joseph	Counsel	07/09/24	3.7	\$700.00	\$2,590.00	Sanctions Judgment: research and drafting for brief in foreclosure action
Hickok, D. Alicia		07/09/24	3.4	\$888.13	\$3,019.63	SANCTIONS JUDGMENT: Review remainder of reproduced record and some case law; send materials and observations to J. Argentina.
McHugh, Brendan P.	Associate	07/09/24	1.2	\$525.00	\$630.00	Sanctions Judgment: Analyze upset price and attendance requirements for sheriff's sale in Delaware County; voicemail message for Ms. Lori Schreiber (Deputy Sheriff, Real Estate).
Argentina, Joseph	Counsel	07/10/24	2.7	\$700.00	\$1,890.00	Sanctions Judgment: continue draft of appellate brief
McHugh, Brendan P.	Associate	07/10/24	2.5	\$525.00	\$1,312.50	Sanctions Judgment: Strategy call with Mr. Joe Argentina regarding Allison McGuckin's appeal of the stay order and sheriff's sale (.4); correspondence with Mr. Joe Argentina regarding appeal-related issues (.2); analyze strategy for upset price at sheriff's sale (.4); analyze procedures and applicability of real estate transfer tax to a sheriff's sale (.7); analyze amount of potentially applicable transfer tax (.2); correspondence with Mr. Joe Argentina regarding the same (.2); confer with sheriff's office deputy regarding certain aspects of the sale (.2); additional correspondence with Mr. Joe Argentina regarding the
Argentina, Joseph	Counsel	07/11/24	5.2	\$700.00	\$3,640.00	Sanctions Judgment: research and drafting for appellate brief

McHugh, Brendan P.	Associate	07/11/24	0.9	\$525.00	\$472.50	Sanctions Judgment: Call with Delaware County Sheriff's Office regarding post-sale requirements and considerations for a purchasing creditor (.2); analyze strategy and next steps regarding the same (.7).
Coe, Richard E.	Partner	07/12/24	0.5	\$815.00	\$407.50	Conference with J. Argentina re: hearing strategy; review briefing on motion for sanctions and send email to J. Argentina re: same
Argentina, Joseph	Counsel	07/12/24	1.1	\$700.00	\$770.00	Sanctions Judgment: prepare for and attend telephonic conference with Montgomery County Court re: discovery sanctions (.9); E-mail correspondence with client re: conference outcomes (.2)
Argentina, Joseph	Counsel	07/12/24	6.8	\$700.00	\$4,760.00	Sanctions Judgment: research and drafting for Gardner brief in foreclosure action
McHugh, Brendan P.	Associate	07/12/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Analyze correspondence from Mr. Joe Argentina regarding conference with Montgomery County Court (.1); analyze whether judgment creditor can deed property to an entity post-sheriff sale (.2).
Argentina, Joseph	Counsel	07/13/24	3.1	\$700.00	\$2,170.00	Sanctions Judgment: research and drafting for Gardner brief in foreclosure action
Argentina, Joseph	Counsel	07/14/24	1.3	\$700.00	\$910.00	Sanctions Judgment: research and drafting for Gardner brief in foreclosure action
Argentina, Joseph	Counsel	07/15/24	3.6	\$700.00	\$2,520.00	Sanctions Judgment: finalize draft of appellate brief in foreclosure action
Argentina, Joseph	Counsel	07/15/24	0.4	\$700.00	\$280.00	Sanctions Judgment: confer with B. McHugh re: hearing on motion for stay and related Sheriff procedures
Argentina, Joseph	Counsel	07/15/24	2.8	\$700.00	\$1,960.00	Sanctions Judgment: prepare for hearing in Delaware County Court of Common Pleas on motion for stay pending appeal
Argentina, Joseph	Counsel	07/15/24	0.2	\$700.00	\$140.00	Sanctions Judgment: review docket in Delaware county action and assign follow-up to FDBR paralegal regarding missing file
Argentina, Joseph	Counsel	07/15/24	0.4	\$700.00	\$280.00	Sanctions Judgment: confer with client re: hearing on motion for stay pending appeal
McHugh, Brendan P.	Associate	07/15/24	0.6	\$525.00	\$315.00	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina in advance of July 16th hearing before Judge Barry Dozer (.4); analyze overall strategy in connection with the same (.2); call to sheriff's office regarding sale and post-sale logistics (.2); analyze procedural rules in connection with the same (.2); e-mail correspondence with Mr. Joe Argentina regarding the same (.2)
Argentina, Joseph	Counsel	07/16/24	4.9	\$700.00	\$3,430.00	Sanctions Judgment: prepare for and attend hearing on motion for stay pending appeal in Delaware County Court of Common Pleas
Argentina, Joseph	Counsel	07/16/24	3.3	\$700.00	\$2,310.00	Sanctions Judgment: draft Gardner/McGuckin settlement order; multiple email correspondences with counsel to McGuckin, Judge Dozer chambers, Sheriff; multiple rounds of revisions by all parties; confer with B. McHugh re: sheriff procedures and
McHugh, Brendan P.	Associate	07/16/24	1.4	\$525.00	\$735.00	Sanctions Judgment: Strategy calls with Mr. Joe Argentina regarding hearing and settlement (.4); analyze and edit Order memorializing settlement agreement to be so-Ordered (.4); analyze requirements to continue a sheriff sale for one month (.5); e-mail correspondence to Mr. Joe Argentina regarding the same (.2); analyze praecipe for discontinuance filed by Allison McGuckin on her appeal and strategy regarding the same
Argentina, Joseph	Counsel	07/17/24	0.4	\$700.00	\$280.00	Sanctions Judgment: review notice of discontinuance of appeal; review appellate docket; related email with client
Argentina, Joseph	Counsel	07/17/24	0.8	\$700.00	\$560.00	Sanctions Judgment: research obligations and procedures for marking judgments satisfied; related email with counsel to McGuckin
McHugh, Brendan P.	Associate	07/17/24	1.0	\$525.00	\$525.00	Sanctions Judgment: Analyze correspondence from Superior Court regarding discontinuance of appeal (.3); analyze stipulated order signed by Judge Dozer and correspondence regarding the same (.3); analyze next steps and requirements in light of the same (.3); correspondence with Mr. Joe Argentina regarding the same (.2); analyze procedural rules regarding continuance of sheriff sale (.2)

Argentina, Joseph	Counsel	07/18/24	0.7	\$700.00	\$490.00	Sanctions Judgment: analyze obligations to coordinate with Sheriff in foreclosure sale in light of new order (.4); email correspondence with Delaware County Sheriff Office re: continuance of sheriff sale (.3)
Argentina, Joseph	Counsel	07/18/24	1.2	\$700.00	\$840.00	Sanctions Judgment: review foundational legal research on potential new motion for additional sanctions award (.6); assign follow-up research to M. Cho re: same (.6).
Cho, Maria J.	Associate	07/18/24	0.4	\$608.13	\$243.25	Call with J. Argentina re: sanctions research
McHugh, Brendan P.	Associate	07/18/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Strategy call with Mr. Joe Argentina regarding next steps for additional sanctions in Montgomery County and Bankruptcy.
McHugh, Brendan P.	Associate	07/18/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze correspondence from inquiring prospective purchaser at Sheriff sale and respond to the same.
McHugh, Brendan P.	Associate	07/18/24	0.9	\$525.00	\$472.50	Sanctions Judgment: Analyze strategy regarding continuance and applicable rules of civil procedure (.4); correspondence with Joe Argentina regarding the same (.3); analyze correspondence from Delaware County Solicitor regarding the same (.2).
Argentina, Joseph	Counsel	07/19/24	0.7	\$700.00	\$490.00	Sanctions Judgment: phone and email correspondence with McGuckin lender and client re: settlement payment details
McHugh, Brendan P.	Associate	07/19/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Analyze certified order requirement for continued sheriff sale.
Argentina, Joseph	Counsel	07/22/24	0.3	\$700.00	\$210.00	Sanctions Judgment: phone and email correspondence with client and McGuckin lender re: settlement payment
McHugh, Brendan P.	Associate	07/24/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze list of sales continued from July 19th on the sheriff's website to ensure that the sale of the carriage house property was continued.
McHugh, Brendan P.	Associate	07/25/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Analyze strategy and next steps regarding collection and payment.
Rank, Robin E.	Paralegal	07/29/24	1.2	\$411.25	\$493.50	Communications with J. Argentina regarding settlement
Argentina, Joseph	Counsel	07/29/24	0.6	\$700.00	\$420.00	Sanctions Judgment: E-mail correspondence with client re: payment (.2); assign review of satisfaction procedures in all jurisdictions to R. Rank (.2); review initial results and assign follow-up work (.2).
McHugh, Brendan P.	Associate	07/29/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze correspondence from Mr. Joe Argentina regarding marking judgment satisfied in all counties (.1); analyze strategy regarding the same (.3).
Argentina, Joseph	Counsel	07/30/24	0.6	\$700.00	\$420.00	Sanctions Judgment: E-mail correspondence with Delaware County Sheriff re: August 16 foreclosure sale (.2); review fee schedules for satisfaction of judgment and praecipe to discontinue (.2); E-mail correspondence with D. Heim re: satisfaction (.2).
McHugh, Brendan P.	Associate	07/30/24	1.1	\$525.00	\$577.50	Sanctions Judgment: Correspondence with Mr. Joe Argentina regarding next steps (.3); draft and send letter to Delaware County Sheriff's Office regarding August 16th sale (.5); analyze correspondence from Delaware County Solicitor (.1), Delaware County Sheriff (.1), and David Heim (.1) regarding the same.
Argentina, Joseph	Counsel	08/01/24	1.5	\$700.00	\$1,050.00	Sanctions Judgment: revise fee details and resubmit proposed order on discovery sanctions award as per instructions from Montgomery County Court (.8); telephone conference with client re: same (.3); E-mail correspondence with court and opposing counsel re: new proposed order and status conference on 8-2-24 (.2); confer with R. Coe
Argentina, Joseph	Counsel	08/02/24	0.6	\$700.00	\$420.00	Sanctions Judgment: Prepare for and attend status conference on discovery sanctions
Argentina, Joseph	Counsel	08/02/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with client re: status conference on discovery sanctions
Rank, Robin E.	Paralegal	08/05/24	0.8	\$411.25	\$329.00	Contact Montgomery, Monroe, Philadelphia, Bucks, Northampton and Delaware Prothonotaries to confirm filing fee for Praecipe to Satisfy Judgment
McHugh, Brendan P.	Associate	08/05/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Strategy meeting with Mr. Joe Argentina.
McHugh, Brendan P.	Associate	08/06/24	0.2	\$525.00	\$105.00	Analyze correspondence from Ms. Robin Rank regarding praecipes to discontinue in various counties.
McHugh, Brendan P.	Associate	08/10/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Attention to correspondence related to discontinuance.

Rank, Robin E.	Paralegal	08/12/24	0.1	\$411.30	\$41.13	Communications with J. Argentina regarding preparing Praecipis for Judgment
Argentina, Joseph	Counsel	08/12/24	0.3	\$700.00	\$210.00	Sanctions Judgment: coordinate preparation and filing of praecipis to mark judgment satisfied and related email correspondence with counsel to McGuckin
McHugh, Brendan P.	Associate	08/12/24	0.2	\$525.00	\$105.00	Correspondence with Mr. Joe Argentina regarding marking judgment satisfied.
Argentina, Joseph	Counsel	08/14/24	2.1	\$700.00	\$1,470.00	Sanctions Judgment: begin draft of response to McGuckin objection to fee affidavit
Argentina, Joseph	Counsel	08/15/24	1.9	\$700.00	\$1,330.00	Sanctions Judgment: finish draft of reply to McGuckin objection to fees (1.5); prepare exhibits (.3); related email to client (.1).
Argentina, Joseph	Counsel	08/16/24	1.2	\$700.00	\$840.00	Sanctions Judgment: finalize reply to McGuckin objection to fee affidavit (.8); coordinate filing of same (.2); review final files before filing (.2).
Argentina, Joseph	Counsel	08/16/24	0.4	\$700.00	\$280.00	Sanctions Judgment: review forms of praecipis to mark judgment satisfied and provide alternate forms to R. Rank
Bonsell, Kaitlyn E.	Paralegal	08/16/24	2.1	\$350.00	\$735.00	Revise and e-serve Reply to McGuckin's Objection to Fee Affidavit.
McHugh, Brendan P.	Associate	08/16/24	0.2	\$525.00	\$105.00	Correspondence with case team regarding Montgomery County Action and next steps.
Rank, Robin E.	Paralegal	08/20/24	2.7	\$411.25	\$1,110.38	Communications with J. Argentina and B. McHugh regarding Praecipis to satisfy judgment; review each Prothonotary website for Bucks, Delaware, Monroe, Montgomery, Northampton and Philadelphia counties to see whether they have their own forms; draft Praecipis to Satisfy Judgment and Mark Settled. Discontinue and End and circulate to
Argentina, Joseph	Counsel	08/20/24	1.6	\$700.00	\$1,120.00	Sanctions Judgment: review and revise praecipis to satisfy judgment and discontinue actions in all PA counties and related email correspondence with FDBR personnel
McHugh, Brendan P.	Associate	08/20/24	0.8	\$525.00	\$420.00	Analyze and edit draft praecipis to mark judgment satisfied in various Pennsylvania counties (.2); research and analyze whether praecipe to settle, end, and discontinue should be filed in connection with the same (.4); correspondence with Mr. Joe Argentina
Rank, Robin E.	Paralegal	08/21/24	2.5	\$411.25	\$1,028.13	Edit satisfactions for filing; draft letter to Prothonotary in Northampton County; efile satisfactions in Buck, Delaware, Monroe, Montgomery, Northampton and Philadelphia
Argentina, Joseph	Counsel	08/21/24	0.5	\$700.00	\$350.00	Sanctions Judgment: draft proposed order for Montgomery county satisfaction filing (.2); coordinate filings in Montgomery and other counties (.3).
Rank, Robin E.	Paralegal	08/22/24	0.8	\$411.25	\$329.00	Communications with J. Argentina regarding satisfaction filings; refile the satisfaction in Monroe County
Argentina, Joseph	Counsel	08/22/24	0.3	\$700.00	\$210.00	Sanctions Judgment: E-mail correspondences with R. Rank regarding satisfaction filings
Rank, Robin E.	Paralegal	08/23/24	0.2	\$411.25	\$82.25	Review Monroe County Court document and download stamped Praecipe to Satisfy
McHugh, Brendan P.	Associate	09/03/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze correspondence from Ms. Robin Rank and Mr. Joe Argentina regarding filing of praecipis to mark judgment satisfied in various Pennsylvania Counties.
McHugh, Brendan P.	Associate	09/03/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze court notices from Montgomery County Court of Common
Rank, Robin E.	Paralegal	09/04/24	0.1	\$411.30	\$41.13	Attention to certified receipt from Northampton County filing
Argentina, Joseph	Counsel	09/05/24	0.5	\$700.00	\$350.00	Sanctions Judgment: E-mail correspondence with Montgomery County Court regarding entry of judgment on discovery sanctions
Argentina, Joseph	Counsel	09/06/24	0.3	\$700.00	\$210.00	Sanctions Judgment: E-mail correspondence with Judge Eisenberg's chambers re: order/judgment on discovery sanctions
Argentina, Joseph	Counsel	09/06/24	4.7	\$700.00	\$3,290.00	Sanctions Judgment: legal research and drafting for motion to reopen Montgomery County case, proposed order, exhibits
Argentina, Joseph	Counsel	09/09/24	0.4	\$700.00	\$280.00	E-mail correspondence with client re: VAC settlement transaction
Argentina, Joseph	Counsel	09/09/24	0.4	\$700.00	\$280.00	Sanctions Judgment: finalize drafts of motion to reopen and supporting documents and send to client for review
Argentina, Joseph	Counsel	09/10/24	0.3	\$700.00	\$210.00	Sanctions Judgment: email correspondence with counsel to McGuckin re: consent to motion to reopen Montgomery County case and related email correspondence with client
McHugh, Brendan P.	Associate	09/10/24	0.6	\$525.00	\$315.00	Further analyze rules and case law regarding re-opening a docket.

Argentina, Joseph	Counsel	09/11/24	0.2	\$700.00	\$140.00	Sanctions Judgment: email correspondence with counsel to McGuckin re: consent to motion to reopen
Argentina, Joseph	Counsel	09/11/24	0.5	\$700.00	\$350.00	Sanctions Judgment: finalize motion to reopen, order, related files, and coordinate filing of
McHugh, Brendan P.	Associate	09/11/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Strategy call with Mr. Joe Argentina regarding motion to reopen case (.2); analyze Delaware County property records regarding whether carriage house is mortgaged and if its ownership structure has changed (.2).
Argentina, Joseph	Counsel	09/12/24	1.6	\$700.00	\$1,120.00	Sanctions Judgment: further revisions to motion to reopen and supporting documents (.3); confer with client re: same (.4); coordinate filing and service of same (.8).
Argentina, Joseph	Counsel	09/12/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with client re: motion to reopen
Bonsell, Kaitlyn E.	Paralegal	09/12/24	0.7	\$350.00	\$245.00	Revise Motion to Reopen.
McHugh, Brendan P.	Associate	09/12/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Further analyze Delaware County Property Records regarding the carriage house (.2); e-mail to Mr. Joe Argentina regarding the same (.2).
McHugh, Brendan P.	Associate	09/12/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Correspondence with Kaitlyn Bonsell and Joe Argentina regarding motion to reopen docket and filing of the same (.2); review local rules of civil procedure in connection with the same (.2).
Bonsell, Kaitlyn E.	Paralegal	09/13/24	0.4	\$350.00	\$140.00	Revise and e-serve Petition to Reopen Case for Limited Purpose.
Argentina, Joseph	Counsel	09/17/24	0.2	\$700.00	\$140.00	Sanctions Judgment: review Montgomery County docket and related email correspondence with K. Bonsell re: motion to reopen case
Bonsell, Kaitlyn E.	Paralegal	09/17/24	0.2	\$350.00	\$70.00	Confer with Prothonotary regarding e-filing event.
McHugh, Brendan P.	Associate	09/19/24	0.6	\$525.00	\$315.00	Sanctions Judgment: Analyze authority regarding ability to proceed further following the marking of a judgment satisfied.
McHugh, Brendan P.	Associate	09/24/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze Monroe, Northampton, and Bucks County dockets to confirm judgment marked satisfied pursuant to praecipes filed there.
McHugh, Brendan P.	Associate	09/27/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Analyze docket sheets in Bucks and Delaware counties to confirm entry of satisfaction of judgment.
Argentina, Joseph	Counsel	09/30/24	0.3	\$700.00	\$210.00	Sanctions Judgment: review memorandum opinion in support of denial of dismissal of Sanctions Appeal
Argentina, Joseph	Counsel	09/30/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with Judge Scott's chambers re: scheduling order on sanctions appeal
Argentina, Joseph	Counsel	09/30/24	0.3	\$700.00	\$210.00	Sanctions Judgment: E-mail correspondences with R. Coe and M. Taticchi, client re: denial of dismissal of sanctions appeal
Argentina, Joseph	Counsel	09/30/24	0.3	\$700.00	\$210.00	Sanctions Judgment: review memorandum opinion in support of dismissal of Trustee
Coe, Richard E.	Partner	09/30/24	0.3	\$815.00	\$244.50	Reveal appeal orders and exchange emails with J. Argentina and M. Taticchi re: same
Coe, Richard E.	Partner	10/01/24	0.2	\$815.00	\$163.00	Review revised drafts of memoranda and orders for bankruptcy appeal and exchange emails with M. Taticchi re: same
Taticchi, Mark D.	Partner	10/01/24	0.3	\$743.77	\$223.13	Analyze order denying Gardner motion to dismiss appeal (0.2); correspond with R. Coe and J. Argentina re: same (0.1).
Argentina, Joseph	Counsel	10/02/24	0.3	\$700.00	\$210.00	Sanctions Judgment: review Sanctions Appeal scheduling order and calendar key deadlines
McHugh, Brendan P.	Associate	10/03/24	0.2	\$525.00	\$105.00	Strategy meeting with Mr. Joe Argentina.
Argentina, Joseph	Counsel	10/04/24	0.3	\$700.00	\$210.00	Review McGuckin objection to reopening Montgomery County case
Argentina, Joseph	Counsel	10/06/24	0.1	\$700.00	\$70.00	Sanctions Judgment: E-mail correspondence with W. Gardner re: McGuckin opposition to motion to reopen case
Argentina, Joseph	Counsel	10/07/24	0.1	\$700.00	\$70.00	Sanctions Judgment: E-mail correspondence with W. Gardner re: McGuckin opposition to motion to reopen Montgomery County case
Argentina, Joseph	Counsel	10/11/24	0.2	\$700.00	\$140.00	Sanctions Judgment: review order reopening Montgomery County case docket
Argentina, Joseph	Counsel	10/12/24	0.1	\$700.00	\$70.00	Sanctions Judgment: E-mail correspondence with W. Gardner re: order reopening Montgomery County docket



Rank, Robin E.	Paralegal	10/14/24	0.1	\$411.30	\$41.13	Review Northampton court register to confirm satisfaction has been accepted; communicate same to J. Argentina
McHugh, Brendan P.	Associate	10/14/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Analyze docket to determine whether notice of Judge Eisenberg's order needs to be provided to court administration.
Rank, Robin E.	Paralegal	10/15/24	0.4	\$411.25	\$164.50	Review filing fees for satisfactions of judgment; prepare fees by county, calculate total and relay information to J. Argentina
Argentina, Joseph	Counsel	10/16/24	0.6	\$700.00	\$420.00	Review order awarding Gardner sanctions against McGuckin (.2); coordinate next steps re: transfer of judgment to Delaware County (.2); email to client re: same (.2).
McHugh, Brendan P.	Associate	10/16/24	1.8	\$525.00	\$945.00	Sanctions Judgment: Analyze Order and Judgment entered by Judge Eisenberg awarding sanctions to Gardner for discovery misconduct in Montgomery County (.3); analyze requirements to transfer the same to Delaware County Court of Common Pleas (.9); correspondence with Mr. Joe Argentina regarding the same (.4); correspondence to Ms. Kaitlyn Bonsell regarding requirement for certified copies of Montgomery County docket and Sanctions Judgment (.2)
Bonsell, Kaitlyn E.	Paralegal	10/17/24	0.3	\$350.00	\$105.00	Prepare documents to transfer judgment to Delaware County.
McHugh, Brendan P.	Associate	10/17/24	0.7	\$525.00	\$367.50	Sanctions Judgment: Draft and edit transfer papers (.5); correspondence with Ms. Kaitlyn Bonsell regarding certified Judgment and Order.
McHugh, Brendan P.	Associate	10/18/24	1.1	\$525.00	\$577.50	Sanctions Judgment: Analyze correspondence and invoice from the Northampton County Sheriff's Office demanding poundage (.2); analyze procedural rules related to poundage (.5); e-mail to Mr. Joe Argentina regarding the same and next steps (.4).
McHugh, Brendan P.	Associate	10/20/24	1.0	\$525.00	\$525.00	Sanctions Judgment: Draft praecipe to transfer Judge Eisenberg's judgment in Gardner's favor to Delaware County; prepare ancillary papers required in connection with the same.
Argentina, Joseph	Counsel	10/21/24	0.4	\$700.00	\$280.00	Confer with B. McHugh re: Northampton County sheriff claim for poundage
Argentina, Joseph	Counsel	10/21/24	0.3	\$700.00	\$210.00	Sanctions Judgment: review analysis by B. McHugh re: Northampton County sheriff claim for poundage
McHugh, Brendan P.	Associate	10/21/24	3.3	\$525.00	\$1,732.50	Sanctions Judgment: Analyze invoice from Northampton County Sheriff's office claiming poundage (.3); analyze Pennsylvania Rules of Civil Procedure and case law regarding Sheriff's right to the same (2.0); meeting with Mr. Joe Argentina regarding the same (.4); follow-up correspondence with Mr. Joe Argentina regarding the same (.4); voicemail message for Northampton County Solicitor regarding the poundage claim (.2)
McHugh, Brendan P.	Associate	10/21/24	1.0	\$525.00	\$525.00	Sanctions Judgment: Draft praecipe to transfer Judge Eisenberg's judgment in Gardner's favor to Delaware County; prepare ancillary papers required in connection with the same; correspondence with Mr. Joe Argentina and Ms. Kaitlyn Bonsell regarding the same.
McHugh, Brendan P.	Associate	10/22/24	1.6	\$525.00	\$840.00	Sanctions Judgment: Further analyze sheriff's entitlement to poundage following payment pursuant to a writ of attachment (.8); correspondence with Mr. Joe Argentina regarding the same (.2); analyze court notices from Montgomery County Court of Common Pleas
McHugh, Brendan P.	Associate	10/23/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Analyze Court Notices from Montgomery County Court of Common Pleas (.2); correspondence with Mr. Joe Argentina and Ms. Kaitlyn Bonsell regarding praecipe to transfer and required ancillary documents for the same (.3).
Argentina, Joseph	Counsel	10/28/24	2.8	\$700.00	\$1,960.00	Sanctions Judgment: legal research and drafting for letter to Northampton County Sheriff re: claim for poundage.
Argentina, Joseph	Counsel	10/28/24	0.4	\$700.00	\$280.00	Sanctions Judgment: confer with B. McHugh re: Northampton Sheriff demand for
Argentina, Joseph	Counsel	10/28/24	0.6	\$700.00	\$420.00	Sanctions Judgment: review Northampton County docket and key pleadings, Sheriff demand for poundage, initial analysis by B. McHugh.
Argentina, Joseph	Counsel	10/29/24	2.2	\$700.00	\$1,540.00	Sanctions Judgment: research and drafting for letter and prepare exhibits to Northampton County Sheriff; related email correspondence with W. Gardner.
Argentina, Joseph	Counsel	10/29/24	0.4	\$700.00	\$280.00	Sanctions Judgment: confer with W. Gardner re: discovery sanctions, Northampton Sheriff

Argentina, Joseph	Counsel	10/29/24	0.6	\$700.00	\$420.00	Sanctions Judgment: finalize praecipe package to transfer discovery sanctions judgment to Delaware County (.4); coordinate filings with R. Rank (.2).
Argentina, Joseph	Counsel	10/30/24	0.3	\$700.00	\$210.00	Sanctions Judgment: Initial review of McGuckin's appellant brief
Argentina, Joseph	Counsel	10/30/24	0.2	\$700.00	\$140.00	Sanctions Judgment: further attention to transfer of Discovery Sanctions Judgment to Delaware County.
Rank, Robin E.	Paralegal	10/30/24	1.7	\$411.25	\$699.13	Perform file organization and maintenance; review pleadings; create new filing, upload and efile new judgment in Delaware County
Taticchi, Mark D.	Partner	10/30/24	0.7	\$743.76	\$520.63	Analyze McGuckin opening brief on appeal.
Coe, Richard E.	Partner	10/31/24	3.7	\$815.00	\$3,015.50	Review McGuckin appeal brief, sanctions opinion and motion to dismiss and outline points for appeal response brief
Argentina, Joseph	Counsel	10/31/24	0.2	\$700.00	\$140.00	Sanctions Judgment: coordinate delivery of Appellant's brief and exhibits to client.
Argentina, Joseph	Counsel	10/31/24	1.4	\$700.00	\$980.00	Sanctions Judgment: review prior pleadings for briefing on issues raised by Appellant's
Argentina, Joseph	Counsel	10/31/24	0.3	\$700.00	\$210.00	Sanctions Judgment: Finalize and deliver letter to Northampton Sheriff re: poundage invoice (.3); E-mail correspondences with Northampton Sheriff and client re: poundage
Argentina, Joseph	Counsel	10/31/24	0.8	\$700.00	\$560.00	Sanctions Judgment: review Appellant's brief
Hess, Ever M.	Associate	10/31/24	0.3	\$625.63	\$187.69	Call with M. Taticchi to discuss matter status and briefing strategy.
Taticchi, Mark D.	Partner	10/31/24	0.8	\$743.75	\$595.00	Confer with E. Hess re: matter background (0.3); review bankruptcy court's sanctions opinion (0.5).
Rank, Robin E.	Paralegal	11/01/24	1.2	\$411.25	\$493.50	Communications with J. Argentina regarding rejected filing; attention to refiling process
Coe, Richard E.	Partner	11/01/24	0.5	\$815.00	\$407.50	Review bankruptcy court recusal opinion and draft points for response to appeal brief.
Coe, Richard E.	Partner	11/01/24	0.6	\$815.00	\$489.00	Conference with J. Argentina and M. Taticchi re: response to appeal brief
Coe, Richard E.	Partner	11/01/24	0.2	\$815.00	\$163.00	Review prior research on advice of counsel defense and send email to J. Argentina re:
Argentina, Joseph	Counsel	11/01/24	6.8	\$700.00	\$4,760.00	Sanctions Judgment: attention to appellee brief in Sanctions Appeal (review prior court orders, research applicable standards of review, begin draft brief).
Argentina, Joseph	Counsel	11/01/24	0.3	\$700.00	\$210.00	Sanctions Judgment: Confer with W. Gardner re: sanctions appeal briefing.
Argentina, Joseph	Counsel	11/01/24	0.5	\$700.00	\$350.00	Sanctions Judgment: Conference with R. Coe and M. Taticchi re: sanctions appeal briefing.
Argentina, Joseph	Counsel	11/04/24	2.2	\$700.00	\$1,540.00	Sanctions Judgment: Research and drafting for Appellee brief.
Argentina, Joseph	Counsel	11/05/24	6.2	\$700.00	\$4,340.00	Sanctions Judgment: Continue draft of Appellee brief.
Argentina, Joseph	Counsel	11/06/24	4.2	\$700.00	\$2,940.00	Sanctions Judgment: continue drafting background section for Appellee brief.
Argentina, Joseph	Counsel	11/08/24	3.6	\$700.00	\$2,520.00	Sanctions Judgment: continue draft of background section for Appellee brief.
Argentina, Joseph	Counsel	11/11/24	3.8	\$700.00	\$2,660.00	Sanctions Judgment: further analysis, research and drafting for appellee brief.
Coe, Richard E.	Partner	11/11/24	0.2	\$815.00	\$163.00	Exchange emails with J. Argentina re: question presented and evidentiary issues for appeal
Argentina, Joseph	Counsel	11/12/24	4.4	\$700.00	\$3,080.00	Sanctions Judgment: continue drafting appellee brief; coordinate record recovery and legal research projects.
Argentina, Joseph	Counsel	11/14/24	2.7	\$700.00	\$1,890.00	Sanctions Judgment: continue draft of appellee brief, review legal research results from E.
Argentina, Joseph	Counsel	11/15/24	3.6	\$700.00	\$2,520.00	Sanctions Judgment: continue draft of Appellee brief.
Argentina, Joseph	Counsel	11/17/24	2.3	\$700.00	\$1,610.00	Sanctions Judgment: continue draft of Appellee brief.
Argentina, Joseph	Counsel	11/18/24	0.4	\$700.00	\$280.00	Sanctions Judgment: review and analyze McGuckin motion for payment plan in Montgomery County.
Argentina, Joseph	Counsel	11/18/24	6.7	\$700.00	\$4,690.00	Sanctions Judgment: continue draft of Appellee brief in Sanctions Appeal.
Coe, Richard E.	Partner	11/18/24	0.6	\$815.00	\$489.00	Review motion to strike Cohen affidavit and send email to J. Argentina re: proposed response to Cohen argument in appeal brief
Greer, Cathy M.	Paralegal	11/18/24	1.5	\$428.75	\$643.13	Retrieve certificate of appeal and exhibits for appellate case
McHugh, Brendan P.	Associate	11/18/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Analyze motion for payment plan filed by McGuckin in Montgomery County; correspondence with case team regarding the same.
Argentina, Joseph	Counsel	11/19/24	0.3	\$700.00	\$210.00	Sanctions Judgment: telephone conference with W. Gardner re: McGuckin motion for payment plan.

Argentina, Joseph	Counsel	11/19/24	0.2	\$700.00	\$140.00	Sanctions Judgment: retrieve and review order setting hearing on McGuckin motion for payment plan.
Argentina, Joseph	Counsel	11/19/24	3.3	\$700.00	\$2,310.00	Sanctions Judgment: Finish first draft of Appellee brief in Sanctions Appeal.
McHugh, Brendan P.	Associate	11/19/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Analyze scheduling order (.1); correspondence with Mr. Joe Argentina regarding encumbrances and ownership status of carriage house (.4).
Rank, Robin E.	Paralegal	11/20/24	0.2	\$411.25	\$82.25	Communications with B. McHugh regarding additional judgment
Argentina, Joseph	Counsel	11/20/24	0.6	\$700.00	\$420.00	Sanctions Judgment. Review property records re: McGuckin's fraudulent transfer of carriage house; related email correspondence with B. McHugh re: same and Rex garnishment; related email correspondence with W. Gardner.
McHugh, Brendan P.	Associate	11/20/24	1.2	\$525.00	\$630.00	Sanctions Judgment: Draft and edit garnishment writ papers to Rex Medical (.5); analyze interest calculations for the same (.2); e-mail correspondence with Ms. Robin Rank regarding the same (.5).
Rank, Robin E.	Paralegal	11/21/24	1.7	\$411.25	\$699.13	Communications with B. McHugh regarding preparing and filing new judgment in Montgomery County; review court and sheriff websites for filing and service fees; calculate fees; revise Praecipe and Writ of Execution; send to B. McHugh for review
Argentina, Joseph	Counsel	11/21/24	0.4	\$700.00	\$280.00	Sanctions Judgment: E-mail correspondences with FDBR appellate team re: Appellee brief.
Argentina, Joseph	Counsel	11/21/24	0.3	\$700.00	\$210.00	Sanctions Judgment: brief review of M. Taticchi's edits to Appellee brief.
Argentina, Joseph	Counsel	11/21/24	2.2	\$700.00	\$1,540.00	Sanctions Judgment: draft objection to McGuckin motion for payment plan.
McHugh, Brendan P.	Associate	11/21/24	0.8	\$525.00	\$420.00	Sanctions Judgment: Analyze and edit writ of execution and praecipe for the same (.4); conference call with Ms. Robin Rank regarding the same (.2); follow up correspondence with Ms. Robin Rank regarding the same (.2).
Rank, Robin E.	Paralegal	11/22/24	1.8	\$411.25	\$740.25	Prepare and file Writ
Argentina, Joseph	Counsel	11/22/24	0.1	\$700.00	\$70.00	Sanctions Judgment: Telephone conference with W. Gardner re: Appellee brief.
Argentina, Joseph	Counsel	11/22/24	0.1	\$700.00	\$70.00	Sanctions Judgment: E-mail correspondence with W. Gardner re: Appellee brief.
Argentina, Joseph	Counsel	11/22/24	2.1	\$700.00	\$1,470.00	Sanctions Judgment: Review and revise Appellee brief: incorporate edits and questions from M. Taticchi and R. Coe, additional revisions.
Argentina, Joseph	Counsel	11/22/24	0.3	\$700.00	\$210.00	Telephone conference with W. Gardner re: McGuckin collection issues.
Coe, Richard E.	Partner	11/22/24	2.9	\$815.00	\$2,363.50	Review and revise appeal brief and exchange emails with J. Argentina and M. Taticchi re:
Rank, Robin E.	Paralegal	11/25/24	1.7	\$411.25	\$699.13	Communications with B. McHugh regarding rejected filing; telephone call with Prothonotary's office; update pleadings and refile with Prothonotary
Argentina, Joseph	Counsel	11/25/24	4.4	\$700.00	\$3,080.00	Sanctions Judgment: multiple rounds of revisions to Appellee brief; related legal and factual research; email correspondence with FDBR personnel.
Coe, Richard E.	Partner	11/25/24	1.8	\$815.00	\$1,467.00	Review client comments to brief, review and revise brief and exchange emails with J. Argentina and M. Taticchi re: same
McHugh, Brendan P.	Associate	11/25/24	0.6	\$525.00	\$315.00	Sanctions Judgment: Correspondence with Ms. Robin Rank regarding garnishment writ to Rex Medical, LP (.3); separate correspondence with Mr. Joe Argentina regarding the same
Rank, Robin E.	Paralegal	11/26/24	1.3	\$411.25	\$534.63	Communications with B. McHugh regarding sending writ package to Sheriff; download writ package executed by the Montgomery County Prothonotary; draft letter to sheriff; draft Order for Service form for Montgomery County Sheriff; draft and send instructions with Sheriff's letter, Order for Service Form and Writ package to R. Longo to request check and send package to Montgomery County Sheriff for service
Coe, Richard E.	Partner	11/26/24	0.5	\$815.00	\$407.50	Review and revise appeal brief and exchange emails with J. Argentina and M. Taticchi re:
Argentina, Joseph	Counsel	11/26/24	0.5	\$700.00	\$350.00	Sanctions Judgment: revise Appellee brief.
Argentina, Joseph	Counsel	11/26/24	1.8	\$700.00	\$1,260.00	Sanctions Judgment: continue draft of objection to McGuckin motion for payment plan.
Argentina, Joseph	Counsel	11/26/24	0.9	\$700.00	\$630.00	Sanctions Judgment: Final revisions to Appellee brief.
McHugh, Brendan P.	Associate	11/26/24	0.2	\$525.00	\$105.00	Sanctions Judgment: Confer with Ms. Robin Rank regarding status of garnishment writ to Rex Medical LP.

Rank, Robin E.	Paralegal	11/27/24	0.3	\$411.27	\$123.38	Review returned mail; communications with J. Argentina and B. McHugh regarding returned writ package that was stamped "unable to deliver"
McHugh, Brendan P.	Associate	11/27/24	0.2	\$525.00	\$105.00	Analyze garnishment writ package to be sent to Montgomery County sheriff's office for service upon Rex Medical, LP.
McHugh, Brendan P.	Associate	11/27/24	0.4	\$525.00	\$210.00	Sanctions Judgment: Correspondence with Ms. Robin Rank regarding mailed service to McGuckin returned as undeliverable (.2); analyze address for McGuckin in connection with
Argentina, Joseph	Counsel	11/29/24	1.1	\$700.00	\$770.00	Sanctions Judgment: continue draft of objection to McGuckin motion for payment plan.
Argentina, Joseph	Counsel	12/02/24	6.4	\$700.00	\$4,480.00	Sanctions Judgment: Complete draft of objection to McGuckin motion for stay and
Argentina, Joseph	Counsel	12/02/24	0.1	\$700.00	\$70.00	Sanctions Judgment: E-mail correspondence with client re: draft of objection to McGuckin motion for stay and exhibits.
Rank, Robin E.	Paralegal	12/02/24	0.2	\$411.25	\$82.25	Communications with B. McHugh and J. Argentina regarding returned service package from McGuckin
McHugh, Brendan P.	Associate	12/02/24	0.7	\$525.00	\$367.50	Sanctions Judgment: Analyze correspondence from Ms. Robin Rank regarding transfer of judgment service upon McGuckin and responses to the same (.4); analyze strategy regarding the same (.3).
Argentina, Joseph	Counsel	12/03/24	1.6	\$700.00	\$1,120.00	Sanctions Judgment: finalize draft objection to McGuckin motion for payment plan; coordinate filing and service of same; review and revised proposed order and certificate of
Bonsell, Kaitlyn E.	Paralegal	12/03/24	2.6	\$350.00	\$910.00	Sanctions Judgment: Revise Objection to Payment Plan.
Rank, Robin E.	Paralegal	12/03/24	0.9	\$411.26	\$370.13	Communications with B. McHugh and J. Argentina regarding service of McGuckin and amending Certificate of Service; review case file on court's website; draft Amended Certificate of Service and circulate; prepare directions for R. Longo to resend original service documents and file amended certificate of service
McHugh, Brendan P.	Associate	12/03/24	0.5	\$525.00	\$262.50	Sanctions Judgment: Revise amended certificate of service certifying service of the documents transferring the Montgomery County Sanctions Judgment to Delaware County (.3); correspondence with Ms. Robin Rank regarding the same (.2).
Argentina, Joseph	Counsel	12/04/24	0.1	\$700.00	\$70.00	Sanctions Judgment: review correspondence and check from Northampton County Sheriff.
Argentina, Joseph	Counsel	12/04/24	0.1	\$700.00	\$70.00	Sanctions Judgment: E-mail correspondence with client re: objection to McGuckin stay
Rank, Robin E.	Paralegal	12/04/24	0.1	\$411.30	\$41.13	Communication with J. Argentina regarding partial refund from Northampton County; attention to check from Northampton County
McHugh, Brendan P.	Associate	12/04/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Analyze Objection to Motion to Set Payment Schedule.
Argentina, Joseph	Counsel	12/09/24	2.4	\$700.00	\$1,680.00	Sanctions Judgment: prepare for hearing on 12/10 (review pleadings, case law, case files).
Argentina, Joseph	Counsel	12/09/24	1.7	\$700.00	\$1,190.00	Sanctions Judgment: draft argument outline for hearing on McGuckin motion for payment
Argentina, Joseph	Counsel	12/10/24	0.3	\$700.00	\$210.00	Sanctions Judgment: telephone conference with W. Gardner re: results of hearing.
Argentina, Joseph	Counsel	12/10/24	0.4	\$700.00	\$280.00	Sanctions Judgment: begin draft of proposed order on McGuckin motion for payment
Argentina, Joseph	Counsel	12/10/24	4.8	\$700.00	\$3,360.00	Sanctions Judgment: attend hearing in Montgomery County court on McGuckin motion
Hess, Ever M.	Associate	12/10/24	0.3	\$625.63	\$187.69	Review and analyze reply brief and correspond with M. Taticchi regarding same.
Taticchi, Mark D.	Partner	12/10/24	1.1	\$743.75	\$818.13	Analyze McGuckin EDPA reply brief.
Argentina, Joseph	Counsel	12/11/24	1.6	\$700.00	\$1,120.00	Sanctions Judgment: revise draft order on McGuckin motion for payment plan; begin drafts of note and mortgage (review Fannie Mae forms).
McHugh, Brendan P.	Associate	12/11/24	0.3	\$525.00	\$157.50	Sanctions Judgment: Analyze notice of rescheduled hearing and order related to the same (.2); correspondence with Mr. Joe Argentina regarding the same (.1).
Argentina, Joseph	Counsel	12/12/24	3.4	\$700.00	\$2,380.00	Sanctions Judgment: Draft note and mortgage for McGuckin payment plan.
Argentina, Joseph	Counsel	12/13/24	0.5	\$700.00	\$350.00	Sanctions Judgment: finalize proposed order and exhibits on McGuckin motion for payment plan and related email correspondences with W. Gardner and D. Heim.
Argentina, Joseph	Counsel	12/17/24	0.2	\$700.00	\$140.00	Sanctions Judgment: finalize proposed order on McGuckin motion for payment schedule.
Argentina, Joseph	Counsel	12/17/24	0.5	\$700.00	\$350.00	Sanctions Judgment: E-mail and phone correspondences with Montgomery County Court re: McGuckin motion for payment schedule.

Argentina, Joseph	Counsel	12/18/24	0.2	\$700.00	\$140.00	Sanctions Judgment: review order entered on McGuckin payment motion and related email to W. Gardner.
McHugh, Brendan P.	Associate	12/18/24	0.2	\$525.00	\$105.00	Analyze order entered in Montgomery County Court of Common Pleas.
Argentina, Joseph	Counsel	12/20/24	1.1	\$700.00	\$770.00	Sanctions Judgment: Finish draft of note and mortgage in connection with McGuckin payment plan; related email correspondence with W. Gardner; assign real estate records review to FDBR paralegal.
Ciampitti, Denise A.	Paralegal	12/23/24	1.1	\$358.75	\$394.63	Research Delaware County property information, obtain legal description and update
Argentina, Joseph	Counsel	12/24/24	0.3	\$700.00	\$210.00	Sanctions Judgment: E-mail correspondence with counsel to McGuckin and client re: note and mortgage.
Argentina, Joseph	Counsel	12/24/24	0.4	\$700.00	\$280.00	Review notice of abandonment; related email correspondence with counsel to Trustee and W. Gardner.
Argentina, Joseph	Counsel	12/26/24	0.5	\$700.00	\$350.00	Sanctions Judgment: Revise draft note and mortgage following instructions from client.
Argentina, Joseph	Counsel	12/26/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with W. Gardner re: note and mortgage.
Argentina, Joseph	Counsel	12/26/24	0.4	\$700.00	\$280.00	Sanctions Judgment: finalize note and mortgage and send to counsel to McGuckins for
Argentina, Joseph	Counsel	12/31/24	1.1	\$700.00	\$770.00	Sanctions Judgment: confirm check delivery of McGuckin payment (.3); draft enclosure letter to W. Gardner re: payment (.3); coordinate delivery of same (.2); related email correspondence with W. Gardner and counsel to McGuckins (.3).
					\$1,600,733.68	Total Fees Incurred
					\$160,073.37	Less 10% discount
					<b>\$1,440,660.31</b>	<b>Total Fees Sought</b>

## Gardner Time Entries in Support of Sanctions Application

Incurred in connection with appeals of the Order appointing the Trustee

Fees						
Timekeeper Name	Title	Work Date	Hours	Bill Rate	Billed Amount	Narrative
Morgan, Brian P.	Partner	01/04/22	0.8	\$765.00	\$612.00	Review appellate docket, bankruptcy rules and strategize regarding response to McGuckin's failure to serve appellate brief.
Argentina, Joseph	Counsel	01/04/22	1.2	\$650.00	\$780.00	Confer with C. Hemrick re: appeal (0.4); review appeals docket and notice of briefing schedule (0.2); E-mail correspondence with FDBR personnel re: appeals schedule and next steps (0.6).
Argentina, Joseph	Counsel	01/07/22	1.2	\$650.00	\$780.00	Draft stipulation on appellate briefing and related email correspondence with D. Heim (1.2)
Taticchi, Mark D.	Partner	01/07/22	0.1	\$715.00	\$71.50	Review draft briefing stipulation.
Olivere, Beth A.	Paralegal	01/10/22	0.4	\$385.00	\$154.00	Finalize for filing stipulation of briefing schedule.
Argentina, Joseph	Counsel	01/10/22	0.2	\$650.00	\$130.00	Coordinate filing of stipulation on appellate briefing schedule.
Argentina, Joseph	Counsel	01/10/22	0.1	\$650.00	\$65.00	E-mail correspondence with counsel to Trustee re: stipulation on appellate briefing schedule.
Argentina, Joseph	Counsel	01/10/22	0.1	\$650.00	\$65.00	E-mail correspondence with counsel to McGuckin re: stipulation on appellate briefing schedule.
Coe, Richard E.	Partner	01/10/22	0.6	\$785.00	\$471.00	Exchange emails re: reply brief and conference with J. Argentina re: same.
Coe, Richard E.	Partner	01/17/22	1.0	\$785.00	\$785.00	Review and revise reply brief and exchange emails re: same (0.2); review McGuckin reply brief re: appointment of trustee and send email to J. Argentina re: same (0.6); conference with client re: same (0.2).
Coe, Richard E.	Partner	01/18/22	0.4	\$785.00	\$314.00	Review prior appeal briefing in preparation for drafting appeal brief.
Coe, Richard E.		01/20/22	2.4	\$785.00	\$1,884.00	Review transcript from motion to vacate hearing and draft appeal brief (2.0); conference with J. Argentina re: same (0.4).
Argentina, Joseph	Counsel	01/20/22	0.4	\$650.00	\$260.00	Confer with R. Coe re: appeal.
Taticchi, Mark D.	Partner	01/20/22	0.1	\$715.00	\$71.50	Analyze potential issues to raise in opposition to McGuckin appeal.
Coe, Richard E.	Partner	01/21/22	3.8	\$785.00	\$2,983.00	Research and draft appeal brief.
Coe, Richard E.	Partner	01/22/22	1.5	\$785.00	\$1,177.50	Review and revise appeal brief.
Coe, Richard E.	Partner	01/25/22	2.7	\$785.00	\$2,119.50	Research and draft appeal brief.
Taticchi, Mark D.	Partner	01/26/22	0.5	\$715.00	\$357.50	Review draft appellate brief.
Coe, Richard E.	Partner	01/26/22	1.6	\$785.00	\$1,256.00	Review and revise appeal reply brief and conference with M. Taticchi re: same.
Taticchi, Mark D.	Partner	01/26/22	0.9	\$715.00	\$643.50	Analyze McGuckin appellate brief.
Taticchi, Mark D.	Partner	01/27/22	5.8	\$715.00	\$4,147.00	Revise draft appellate brief.
Taticchi, Mark D.	Partner	01/28/22	1.9	\$715.00	\$1,358.50	Revise draft appellate brief.
Coe, Richard E.	Partner	01/31/22	2.5	\$785.00	\$1,962.50	Review revised draft of appeal brief and revise same.
Taticchi, Mark D.	Partner	02/01/22	2.0	\$715.00	\$1,430.00	Revise draft appellate brief.
Coe, Richard E.	Partner	02/01/22	1.0	\$785.00	\$785.00	Review and revise appeal brief and send email to M. Taticchi re: same.
Coe, Richard E.	Partner	02/02/22	1.9	\$785.00	\$1,491.50	Review and revise appeal brief (0.8); conference with M. Taticchi re: same (0.4); send emails to A. Paxton-Turner re: appeal record and record from prior appeal (0.2); review revised draft of appeal brief and exchange emails re: same (0.5).
Taticchi, Mark D.	Partner	02/02/22	2.8	\$715.00	\$2,002.00	Revise draft appellate brief.
Taticchi, Mark D.	Partner	02/04/22	1.7	\$715.00	\$1,215.50	Revise draft appellate brief.
Argentina, Joseph	Counsel	02/04/22	0.2	\$650.00	\$130.00	Confer with C. Hemrick re: appellate issues.
Argentina, Joseph	Counsel	02/04/22	1.1	\$650.00	\$715.00	Review and revise appellate brief.
Paxton-Turner, Ashlee A.	Associate	02/04/22	2.9	\$485.00	\$1,406.50	Review and revise record cites in brief.
Coe, Richard E.	Partner	02/04/22	4.6	\$785.00	\$3,611.00	Review and revise appeal brief, appendix and supplemental appendix (3.8); conference with A. Paxton-Turner re: same (0.4); conference with M. Taticchi re: same (0.2)
Taticchi, Mark D.	Partner	02/06/22	0.6	\$715.00	\$429.00	Revise draft EDPA appellate brief.
Argentina, Joseph	Counsel	02/06/22	0.1	\$650.00	\$65.00	Multiple e-mail correspondence with C. Hemrick re: appellate issues.

Ruggiero, Mark E.	Paralegal	02/06/22	4.6	\$400.00	\$1,840.00	Review and cite check draft brief.
Coe, Richard E.	Partner	02/07/22	2.3	\$785.00	\$1,805.50	Review and revise appeal brief and supplemental appendix (1.3); draft motion to seal (1.0)
Taticchi, Mark D.	Partner	02/07/22	2.1	\$715.00	\$1,501.50	Revise draft appellate brief (1.8); review draft supplemental appendix and associated motion to seal (0.3).
Paxton-Turner, Ashlee A.	Associate	02/07/22	5.2	\$485.00	\$2,522.00	Review and revise record cites in brief, supplemental appendix and file brief, supplemental appendix, and motion to seal.
Argentina, Joseph	Counsel	02/07/22	0.6	\$650.00	\$390.00	Attention to filing and service of appellate brief.
Argentina, Joseph	Counsel	02/07/22	0.2	\$650.00	\$130.00	Telephone conference with C. Hemrick re: appellate issues (.1); E-mail correspondence with C. Hemrick re: same (.1)
Ruggiero, Mark E.	Paralegal	02/07/22	1.8	\$400.00	\$720.00	Review, cite check, update, and revise draft brief.
Taticchi, Mark D.	Partner	02/08/22	0.8	\$715.00	\$572.00	Analyze potential challenge to appellate jurisdiction.
Coe, Richard E.	Partner	02/08/22	0.4	\$785.00	\$314.00	Review trustee's brief in opposition to McGuckin appeal.
Coe, Richard E.	Partner	02/08/22	0.2	\$785.00	\$157.00	Review research re: bond requirements.
Taticchi, Mark D.	Partner	03/01/22	1.9	\$715.00	\$1,358.50	Analyze McGuckin response brief in EDPA appeal.
Argentina, Joseph	Counsel	03/01/22	1.6	\$650.00	\$1,040.00	Review McGuckin appellate reply brief and related email correspondence with R. Coe and M. Taticchi.
Taticchi, Mark D.	Partner	03/20/22	1.5	\$715.00	\$1,072.50	Review bankruptcy court decision and McGuckin appellate briefing in preparation for conference with Judge Pappert's chambers.
Taticchi, Mark D.	Partner	03/21/22	0.8	\$715.00	\$572.00	Participate in teleconference with Judge Pappert's chambers re: jurisdiction over McGuckin appeal.
Taticchi, Mark D.	Partner	03/21/22	1.8	\$715.00	\$1,287.00	Review research re: retention of appellate jurisdiction to perfect appealability.
Coe, Richard E.	Partner	03/21/22	0.7	\$785.00	\$549.50	Attend status conference with district court re: appeal.
Coe, Richard E.	Partner	03/21/22	0.1	\$785.00	\$78.50	Conference with M. Taticchi re: appeal.
Coe, Richard E.	Partner	03/21/22	0.2	\$785.00	\$157.00	Conference with M. Taticchi re: status conference.
Coe, Richard E.	Partner	03/25/22	0.1	\$785.00	\$78.50	Review order dismissing appeal.
Argentina, Joseph	Counsel	12/01/22	1.2	\$650.00	\$780.00	Initial review of opinion and order denying reconsideration and related email correspondence with W. Gardner
Argentina, Joseph	Counsel	12/29/22	1.2	\$650.00	\$780.00	Appeal of reconsideration order: review McGuckin statement of issues, designations of record, District Court docket (.5); review bankruptcy appeal federal rules (.7).
Coe, Richard E.	Partner	01/03/23	0.3	\$865.00	\$259.50	Review appellate filings.
Coe, Richard E.	Partner	01/03/23	0.3	\$865.00	\$259.50	Conference with J. Argentina re: appellate filings.
Coe, Richard E.	Partner	01/03/23	0.3	\$865.00	\$259.50	Conference with A. Paxton-Turner re: sanctions and reconsideration rulings and appeal.
Coe, Richard E.	Partner	01/03/23	0.3	\$865.00	\$259.50	Send emails to A. Paxton-Turner and M. Taticchi with appeal materials.
Taticchi, Mark D.	Partner	01/04/23	3.1	\$790.00	\$2,449.00	Analyze bankruptcy court opinions denying reconsideration and awarding sanctions (2.8); review appellants' statements of issues on appeal (0.3).
Coe, Richard E.	Partner	01/04/23	0.2	\$865.00	\$173.00	Review appeal filings.
Coe, Richard E.	Partner	01/05/23	0.2	\$865.00	\$173.00	Review VAC appeal filings.
Taticchi, Mark D.	Partner	01/06/23	1.8	\$790.00	\$1,422.00	Draft analysis of potential advice-of-counsel defenses (1.6); correspond with A. Paxton-Turner re: research concerning same (0.2).
Coe, Richard E.	Partner	01/06/23	0.2	\$865.00	\$173.00	Exchange emails with M. Taticchi re: appellate arguments and research projects.
Coe, Richard E.	Partner	01/06/23	0.4	\$865.00	\$346.00	Review research on advice of counsel defense and exchange emails re: same.
Taticchi, Mark D.	Partner	01/09/23	0.7	\$790.00	\$553.00	Review and revise draft record designations (0.5); correspond with R. Coe and J. Argentina re: same (0.2).
Taticchi, Mark D.	Partner	01/09/23	0.3	\$790.00	\$237.00	Confer with A. Paxton-Turner re: advice-of-counsel and waiver research, in connection with sanctions appeal.
Argentina, Joseph	Counsel	01/09/23	1.2	\$745.00	\$894.00	Revise record designations for appeals on Sanctions and Trustee Order.
Paxton-Turner, Ashlee A.	Associate	01/09/23	0.3	\$615.00	\$184.50	Call with M. Taticchi regarding research for appeal.
Coe, Richard E.	Partner	01/09/23	1.4	\$865.00	\$1,211.00	Review and revise designations for record on appeal and send email re: same.
Taticchi, Mark D.	Partner	01/10/23	0.2	\$790.00	\$158.00	Review and revise draft record designations (0.1); correspond with R. Coe and J. Argentina re: same (0.1).
Argentina, Joseph	Counsel	01/10/23	0.4	\$745.00	\$298.00	Draft, revise, and coordinate filing of entry of appearance for appeals of Trustee order.

Olivere, Beth A.	Paralegal	01/10/23	1.0	\$420.00	\$420.00	Edit, revise and finalize for filing notices of appearance in both the 22-05011 and 22- 4981 appeal matters.
Coe, Richard E.	Partner	01/10/23	0.2	\$865.00	\$173.00	Review designation of record and entries of appearance and exchange emails re: same.
Paxton-Turner, Ashlee A.	Associate	01/20/23	1.1	\$615.00	\$676.50	Research regarding advice-of-counsel defense.
Argentina, Joseph	Counsel	02/02/23	1.1	\$745.00	\$819.50	Review appellate rules and analyze briefing schedule for McGuckin appeals (.8); draft email analysis to M. Taticchi (.3).
Taticchi, Mark D.	Partner	02/28/23	0.3	\$790.00	\$237.00	Analyze potential grounds for motion to dismiss appeal (0.2); correspond with R. Coe and J. Argentina re: same (0.1).
Argentina, Joseph	Counsel	03/03/23	0.3	\$745.00	\$223.50	Trustee Order Appeal: continue draft of motion to dismiss appeal.
Argentina, Joseph	Counsel	03/06/23	2.8	\$745.00	\$2,086.00	Trustee order appeal: continue draft of motion to dismiss.
Coe, Richard E.	Partner	03/06/23	0.2	\$865.00	\$173.00	Exchange emails and review research re: motion to dismiss bankruptcy appeal.
Imani, Roya	Associate	03/06/23	5.0	\$685.00	\$3,425.00	Research and analyze case law regarding Fed. R. Bankr. P. 8018(a)(4) and record- transmission error; email to J. Argentina, M. Taticchi, and R. Coe.
Argentina, Joseph	Counsel	03/07/23	2.9	\$745.00	\$2,160.50	Appeal of Trustee Order: legal research and drafting for motion to dismiss appeal.
Imani, Roya	Associate	03/07/23	0.1	\$685.00	\$68.50	Email with J. Argentina regarding motion to dismiss the appeals.
Argentina, Joseph	Counsel	03/08/23	1.1	\$745.00	\$819.50	Trustee order appeal: review and implement edits to motion to dismiss by M. Taticchi (. 3); email to FDBR team regarding various motion issues (.2); analyze rules on filing supporting briefs, proposed orders, <del>service motion format exhibits disclosures (. 6)</del>
Miller, Kathryn B.	Paralegal	03/09/23	0.6	\$360.00	\$216.00	Perform Westlaw cite check report and review and revise motion to dismiss appeal for order appointing trustee for failure to file brief.
Nielsen, Peter D.	Paralegal	03/09/23	1.2	\$390.00	\$468.00	Draft Declarations for Argentina ISO Motion to Dismiss Appeal of Order Appointing Trustee for Failure to File Brief and Motion to Dismiss the Sanctions Appeal.
Argentina, Joseph	Counsel	03/09/23	3.6	\$745.00	\$2,682.00	Trustee Order Appeal: revise motion to dismiss appeal for lack of prosecution (.8); legal research on equitable mootness (.6); email correspondence with FDBR team regarding various issues (.5); email correspondence with counsel to McGuckin re: consent (.2); review letter filing from McGuckin requesting consolidation and briefing schedule (.2); revise declaration in support of motion to dismiss appeal (.3); prepare exhibits to declaration (.3); finalize, file, and serve motion and related documents (.7).
Argentina, Joseph	Counsel	03/10/23	0.6	\$745.00	\$447.00	Trustee Order Appeal: legal research on standards for seeking extensions of deadlines to file appellate briefs.
Argentina, Joseph	Counsel	03/10/23	0.7	\$745.00	\$521.50	Trustee Order Appeal: analyze possible responses to letter filing from McGuckin requesting briefing schedule and assign follow-up analysis to R. Imani.
Argentina, Joseph	Counsel	03/12/23	2.6	\$745.00	\$1,937.00	Trustee Order Appeal: review and revise analysis by R. Imani regarding motion to request extension of appellate briefs (.8); draft letter response to McGuckin's letter request to consolidate appeals (1.8).
Argentina, Joseph	Counsel	03/13/23	0.8	\$745.00	\$596.00	Trustee Order Appeal: finalize and file letter response to McGuckin letter requesting briefing schedule.
Argentina, Joseph	Counsel	03/16/23	0.1	\$745.00	\$74.50	Trustee Order Appeal: review docket for any response to motion to dismiss appeal.
Argentina, Joseph	Counsel	03/17/23	0.8	\$745.00	\$596.00	Trustee Order Appeal: review and revise draft letter granting Motion to Dismiss as uncontested and related email correspondence with FDBR personnel.
Argentina, Joseph	Counsel	03/18/23	0.3	\$745.00	\$223.50	Trustee Order Appeal: review and revise letter requesting granting motion to dismiss as uncontested.
Argentina, Joseph	Counsel	03/20/23	0.2	\$745.00	\$149.00	Trustee Order Appeal: finalize and file letter requesting dismissal as uncontested.



Argentina, Joseph	Counsel	03/22/23	0.1	\$745.00	\$74.50	Trustee Appeal: review order consolidating appeals and related email correspondence with R. Coe and M Taticchi.
Argentina, Joseph	Counsel	03/24/23	1.1	\$745.00	\$819.50	Trustee Order Appeal: review and analyze response to motion to dismiss and draft initial thoughts to FDBR group.
Argentina, Joseph	Counsel	03/27/23	0.6	\$745.00	\$447.00	Trustee Order Appeal: review Judge Scott's order scheduling pretrial conference and form 26(f) files; procedures; and Federal Rules 26 and 16.
Argentina, Joseph	Counsel	03/28/23	0.7	\$745.00	\$521.50	Trustee Order Appeal: draft email to opposing counsel with recommended process to comply with order scheduling Rule 16 pretrial conference; manage case calendar.
Argentina, Joseph	Counsel	03/28/23	0.2	\$745.00	\$149.00	Trustee Appeal: Initial review of reply brief.
Coe, Richard E.	Partner	03/28/23	0.2	\$865.00	\$173.00	Review reply in support of motion to dismiss appeal and send email re: same.
Imani, Roya	Associate	03/28/23	2.1	\$685.00	\$1,438.50	Research case law relating to reply pleading; emails with internal counsels regarding same.
Imani, Roya	Associate	03/29/23	0.8	\$685.00	\$548.00	Review reply drafts and emails with internal counsels regarding same.
Argentina, Joseph	Counsel	03/29/23	2.4	\$745.00	\$1,788.00	Trustee Order Appeal: revise reply brief in support of motion to dismiss.
Coe, Richard E.	Partner	03/29/23	0.4	\$865.00	\$346.00	Review and revise multiple drafts of reply in support of motion to dismiss appeal.
Argentina, Joseph	Counsel	03/30/23	0.7	\$745.00	\$521.50	Trustee Appeal: finalize, file, and serve Reply in support of MTD.
Argentina, Joseph	Counsel	04/02/23	1.1	\$745.00	\$819.50	Trustee Order Appeal: review and revise draft form 26(f) document for submission to Judge Scott and related email correspondence with counsel to appellants
Argentina, Joseph	Counsel	04/03/23	0.8	\$745.00	\$596.00	Trustee Appeal: attend Rule 16 conference (. 2); email correspondence with counsel to Appellants and Trustee regarding appeals (. 2); review and revise draft status reports (. 2); analyze magistrate judge issues (. 2).
Argentina, Joseph	Counsel	04/10/23	1.8	\$745.00	\$1,341.00	Trustee Appeal: prepare for conference with Judge Scott; attend conference in Judge Scott's chambers (incl. travel); post- conference analysis and email correspondence with client; call with client.
Argentina, Joseph	Counsel	04/11/23	1.3	\$745.00	\$968.50	Trustee appeal: analyze Article 3 standing issues and equitable mootness and draft email to M. Taticchi re: same (1.1); confer with counsel to Trustee re: same (.2)
Argentina, Joseph	Counsel	04/12/23	0.3	\$745.00	\$223.50	Trustee Appeal: review order setting oral argument and analyze potential briefing drafting issues (.2); e-mail correspondence with M. Taticchi re: same (.1).
Argentina, Joseph	Counsel	04/18/23	0.6	\$745.00	\$447.00	Trustee Appeal: review draft joinder to Gardner motion to dismiss and related email correspondence with counsel to Trustee.
Argentina, Joseph	Counsel	04/19/23	1.5	\$745.00	\$1,117.50	Trustee Appeal: review and revise supplemental brief in support of motion to dismiss (1.1); e-mail correspondence with M. Taticchi re: same (.2); confer with counsel to Trustee re: same (.2)
Argentina, Joseph	Counsel	04/20/23	0.8	\$745.00	\$596.00	Trustee appeal: research and analyze evidentiary issues for May hearing on Gardner motions to dismiss.
Argentina, Joseph	Counsel	04/27/23	1.2	\$745.00	\$894.00	Trustee Appeal: draft, file, and serve joinder to Chapter 7 Trustee joinder to Gardner motion to dismiss appeal.
Taticchi, Mark D.	Partner	04/11/23	0.3	\$790.00	\$237.00	Correspond with J. Argentina re: standing argument in support of motion to dismiss trustee appeal.
Taticchi, Mark D.	Partner	04/18/23	0.7	\$790.00	\$553.00	Review Trustee's draft statement of joinder in Gardner motion to dismiss appeal (0.4); correspond with J. Argentina re: same (0.3).
Taticchi, Mark D.	Partner	04/27/23	0.3	\$790.00	\$237.00	Analyze Appellants' opposition to Trustee's joinder in motion to dismiss appeal
Taticchi, Mark D.	Partner	04/28/23	0.6	\$790.00	\$474.00	Analyze Appellants' opposition to Trustee's joinder in motion to dismiss appeal (0.5); correspond with J. Argentina re: same (0.1).
Argentina, Joseph	Counsel	04/28/23	0.6	\$745.00	\$447.00	Trustee Appeal: review Appellants' brief in response to Trustee joinder

Argentina, Joseph	Counsel	05/08/23	2.4	\$745.00	\$1,788.00	Trustee Appeal: prepare for and attend hearing on Gardner motion to dismiss and Trustee joinder (1.9); post-hearing conference with counsel to Trustee (.3); post-hearing call with client (.2)
					\$99,501.50	Total Fees Incurred
					\$9,950.15	Less 10% discount
					<b>\$89,551.35</b>	<b>Total Fees Sought</b>

## Gardner Time Entries in Support of Sanctions Application

Incurred in connection with Gardner's Motion for Sanctions (Appeal Only)

Fees						
Timekeeper Name	Title	Work Date	Hours	Bill Rate	Billed Amount	Narrative
Coe, Richard E.	Partner	12/16/22	0.3	\$785.00	\$235.50	Review stay motion and conference with J. Argentina re: same.
Imani, Roya	Associate	12/16/22	0.5	\$605.00	\$302.50	Confer and emails with J. Argentina regarding legal research.
Coe, Richard E.	Partner	12/18/22	0.2	\$785.00	\$157.00	Review McGuckin motion to stay and supporting papers.
Argentina, Joseph	Counsel	12/19/22	3.3	\$650.00	\$2,145.00	Continue draft of objection to McGuckin motion for stay.
Argentina, Joseph	Counsel	12/19/22	0.2	\$650.00	\$130.00	Initial review of research results on standard of review by appellate court for sanctions.
Imani, Roya	Associate	12/19/22	4.7	\$605.00	\$2,843.50	Conduct legal research regarding imposition of sanctions; email to J. Argentina.
Imani, Roya	Associate	12/20/22	4.0	\$605.00	\$2,420.00	Conduct legal research regarding letter of credit as acceptable security to protect an appellee during an appeal; emails with J. Argentina re: same.
Argentina, Joseph	Counsel	12/26/22	3.7	\$650.00	\$2,405.00	Legal research and drafting for objection to motion for stay pending appeal.
Britton, Kayla D.	Associate	12/27/22	0.3	\$745.00	\$223.50	Review letter of credit application and reply to J. Argentina regarding issues with same.
Argentina, Joseph	Counsel	12/27/22	5.8	\$650.00	\$3,770.00	Research and drafting for objection to McGuckin motion for stay of sanctions order.
Argentina, Joseph	Counsel	12/28/22	6.8	\$650.00	\$4,420.00	Finish first draft of objection to McGuckin motion for stay.
Argentina, Joseph	Counsel	12/29/22	1.0	\$650.00	\$650.00	Finalize and file objection to McGuckin motion for stay (.7); confer with Gardner re: same (.3).
Argentina, Joseph	Counsel	12/29/22	0.5	\$650.00	\$325.00	Appeal of sanctions order: review McGuckin statement of issues, designations of record, District Court docket.
Argentina, Joseph	Counsel	01/03/23	0.4	\$745.00	\$298.00	Review notice of motion and related e-mail correspondence with court regarding hearing on stay motion.
Coe, Richard E.	Partner	01/03/23	0.3	\$865.00	\$259.50	Review research on letters of credit.
Argentina, Joseph	Counsel	01/04/23	3.9	\$745.00	\$2,905.50	Prepare for hearing on motion for stay: review key cases (1.8); draft argument outline (2.1).
Argentina, Joseph	Counsel	01/04/23	1.9	\$745.00	\$1,415.50	Attend hearing on motion for stay (.4); post-hearing call with R. Coe (.5); post-hearing call with W. Gardner (.6); post-hearing email correspondence with court personnel regarding docket entries (.2); calendar key deadlines (.2).
Coe, Richard E.	Partner	01/04/23	0.3	\$865.00	\$259.50	Attend hearing on appeal bond.
Coe, Richard E.	Partner	01/04/23	0.5	\$865.00	\$432.50	Conference with J. Argentina re: hearing on appeal bond.
Morgan, Brian P.	Partner	01/05/23	0.5	\$865.00	\$432.50	Review statement of issues and pleadings/transcripts related to advice of counsel defense.
Argentina, Joseph	Counsel	01/05/23	0.8	\$745.00	\$596.00	Sanctions appeal: review McGuckin and PVI briefing on sanctions and related email with FDBR appeals team.
Taticchi, Mark D.	Partner	01/05/23	2.3	\$790.00	\$1,817.00	Analyze potential waiver of appellate issues by appellants McGuckin and PVI.
Argentina, Joseph	Counsel	01/06/23	0.4	\$745.00	\$298.00	Short initial analysis of 303(i) argument raised in McGuckin's statement of issues on appeal in sanctions.
Argentina, Joseph	Counsel	01/06/23	2.6	\$745.00	\$1,937.00	Review docket and designate additional entries for appeals of sanction and trustee order.
Argentina, Joseph	Counsel	01/10/23	0.4	\$745.00	\$298.00	Draft, revise, and coordinate filing of entry of appearance for appeals of Sanctions order.
Argentina, Joseph	Counsel	01/10/23	0.3	\$745.00	\$223.50	Finalize and file record designations for appeals of Sanctions order.
Argentina, Joseph	Counsel	01/10/23	0.3	\$745.00	\$223.50	Finalize and file record designations for appeals of Trustee order.
Argentina, Joseph	Counsel	01/18/23	0.7	\$745.00	\$521.50	Initial review of McGuckin brief on factors in support of a stay of sanctions.
Imani, Roya	Associate	01/18/23	0.1	\$685.00	\$68.50	Emails with J. Argentina regarding brief reply.
Taticchi, Mark D.	Partner	01/19/23	0.7	\$790.00	\$553.00	Analyze McGuckin brief in support of motion for stay pending appeal (0.5); correspond with R. Coe and J. Argentina re: same (0.2).
Argentina, Joseph	Counsel	01/19/23	0.4	\$745.00	\$298.00	Initial legal research regarding first element of consideration of stay and assign follow up research to R. Imani.
Argentina, Joseph	Counsel	01/19/23	2.7	\$745.00	\$2,011.50	Further review, research, and analysis of McGuckin brief in support of a stay of sanctions judgment and W. Gardner response.

Imani, Roya	Associate	01/19/23	0.2	\$685.00	\$137.00	Email with J. Argentina regarding stay standard.
Coe, Richard E.	Partner	01/19/23	0.4	\$865.00	\$346.00	Review McGuckin letter brief in support of stay and send email to J. Argentina re: same.
Coe, Richard E.	Partner	01/19/23	0.4	\$865.00	\$346.00	Conference with J. Argentina re: stay motion and avoidance claims.
Argentina, Joseph	Counsel	01/20/23	1.6	\$745.00	\$1,192.00	Research and analysis for reply brief on stay factors.
Argentina, Joseph	Counsel	01/20/23	1.9	\$745.00	\$1,415.50	Review research results from R. Imani regarding standards for granting stay during appeal (.8); confer with her on research and follow-up work (1.1).
Imani, Roya	Associate	01/20/23	3.0	\$685.00	\$2,055.00	Conduct legal research and analyze stay pending appeal standards; email and confer with J. Argentina re: same.
Imani, Roya	Associate	01/21/23	2.0	\$685.00	\$1,370.00	Conduct legal research and analyze success on the merits factor for stay pending appeal rule; email to J. Argentina re: same.
Argentina, Joseph	Counsel	01/23/23	1.1	\$745.00	\$819.50	Review additional research on standards for stay.
Argentina, Joseph	Counsel	01/23/23	2.5	\$745.00	\$1,862.50	Research and drafting of reply to McGuckin brief on stay factors.
Morgan, Brian P.	Partner	01/24/23	0.8	\$865.00	\$692.00	Review transcripts of sanctions hearing and analyze extent to which advice of counsel was raised.
Taticchi, Mark D.	Partner	01/24/23	1.4	\$790.00	\$1,106.00	Draft analysis re: potential advice-of- counsel defense (1.0); confer with R. Coe and J. Argentina re: same (0.4).
Argentina, Joseph	Counsel	01/24/23	6.5	\$745.00	\$4,842.50	Legal research and drafting for brief on motion for stay factors.
Argentina, Joseph	Counsel	01/24/23	0.2	\$745.00	\$149.00	Telephone conference with R. Coe regarding briefing on stay motion.
Coe, Richard E.	Partner	01/24/23	0.5	\$865.00	\$432.50	Review briefing and send email to J. Argentina re: advice of counsel defense.
Coe, Richard E.	Partner	01/24/23	0.2	\$865.00	\$173.00	Send email to J. Argentina re: McGuckin litigation and PVI operations for consideration in response brief.
Imani, Roya	Associate	01/24/23	1.5	\$685.00	\$1,027.50	Research advice-of-counsel defense issue; emails with J. Argentina.
Taticchi, Mark D.	Partner	01/25/23	0.2	\$790.00	\$158.00	Correspond with J. Argentina and R. Coe re: contents of opposition to motion for stay pending appeal.
Argentina, Joseph	Counsel	01/25/23	7.3	\$745.00	\$5,438.50	Legal research and drafting for brief on factors to stay bankruptcy order.
Coe, Richard E.	Partner	01/25/23	0.5	\$865.00	\$432.50	Review advice of counsel research forwarded by R. Imani.
Coe, Richard E.	Partner	01/25/23	0.2	\$865.00	\$173.00	Exchange emails re: response brief.
Imani, Roya	Associate	01/25/23	0.7	\$685.00	\$479.50	Research on advice-of-counsel defense; email with J. Argentina re: same.
Argentina, Joseph	Counsel	01/26/23	5.7	\$745.00	\$4,246.50	Research and drafting for reply brief on stay factors.
Argentina, Joseph	Counsel	01/27/23	2.8	\$745.00	\$2,086.00	Research and drafting for brief on stay factors.
Argentina, Joseph	Counsel	01/30/23	4.2	\$745.00	\$3,129.00	Further revisions to brief on stay and related email correspondence with R. Coe and M. Taticchi.
Taticchi, Mark D.	Partner	01/30/23	4.4	\$790.00	\$3,476.00	Revise draft opposition to McGuckin brief in support of motion for stay pending appeal.
Coe, Richard E.	Partner	01/30/23	0.7	\$865.00	\$605.50	Review Revel case and other research forwarded by R. Imani in preparation for reviewing opposition to motion to stay.
Taticchi, Mark D.	Partner	01/31/23	1.6	\$790.00	\$1,264.00	Revise draft opposition to McGuckin brief in support of motion for stay pending appeal.
Argentina, Joseph	Counsel	01/31/23	5.8	\$745.00	\$4,321.00	Multiple rounds of revisions to brief on stay and additional research; related email correspondences with R. Coe, M. Taticchi, and W. Gardner.
Coe, Richard E.	Partner	01/31/23	1.9	\$865.00	\$1,643.50	Review and revise opposition to motion to stay and exchange emails with J. Argentina and M. Taticchi re: same.
Argentina, Joseph	Counsel	02/01/23	4.1	\$745.00	\$3,054.50	Finalize and file brief on stay factors (3.7); confer with W. Gardner re: same (.4).
Coe, Richard E.	Partner	02/01/23	0.3	\$865.00	\$259.50	Review edits to opposition to stay motion.
Argentina, Joseph	Counsel	02/08/23	5.0	\$745.00	\$3,725.00	Prepare for hearing on McGuckin motion for stay of sanctions judgment; review pleadings and case law; draft argument outline; analyze post-judgment interest issues (3.7); attend hearing (.6); post-hearing calls with R. Coe and W. Gardner (.7).
Olivere, Beth A.	Paralegal	02/08/23	0.7	\$420.00	\$294.00	Order expedited transcript from 2/8/23 hearing; submit to Judge Chan's ECRU.
Coe, Richard E.	Partner	02/08/23	0.2	\$865.00	\$173.00	Attend hearing on motion to stay sanctions.
Coe, Richard E.	Partner	02/08/23	0.1	\$865.00	\$86.50	Conference with J. Argentina re: hearing on motion to stay sanctions.
Argentina, Joseph	Counsel	02/28/23	2.9	\$745.00	\$2,160.50	Appeals of Sanctions and Trustee Order: analyze potential for motion to dismiss appeals for failure to timely file briefs and draft short analysis for R. Coe and M. Taticchi (1.8); begin draft of motion (1.1).
Argentina, Joseph	Counsel	02/28/23	1.2	\$745.00	\$894.00	Appeals of Sanctions and Trustee Order: review and analyze apparent defects in exhibits listed on docket and draft email to FDBR team on the issue.

Argentina, Joseph	Counsel	03/01/23	1.8	\$745.00	\$1,341.00	Sanctions appeal: continue draft of motion to dismiss appeal.
Argentina, Joseph	Counsel	03/02/23	0.4	\$745.00	\$298.00	Call with R. Imani regarding research for motion to dismiss McGuckin appeals of Sanctions and Reconsideration orders.
Argentina, Joseph	Counsel	03/02/23	5.3	\$745.00	\$3,948.50	Sanctions and Trustee Order appeals: continue draft of motions to dismiss and analysis of related issues.
Imani, Roya	Associate	03/02/23	3.1	\$685.00	\$2,123.50	Conduct legal research and analyze issue related to FRBP 8018(a)(4); confer and emails with J. Argentina to discuss motions to dismiss the appeals.
Argentina, Joseph	Counsel	03/03/23	0.3	\$745.00	\$223.50	Sanctions Appeal: continue draft of motion to dismiss appeal.
Imani, Roya	Associate	03/04/23	0.1	\$685.00	\$68.50	Email to J. Argentina regarding next steps in conducting legal research.
Argentina, Joseph	Counsel	03/06/23	2.7	\$745.00	\$2,011.50	Sanctions appeal: continue draft of motion to dismiss.
Argentina, Joseph	Counsel	03/07/23	2.9	\$745.00	\$2,160.50	Sanctions: legal research and drafting for motion to dismiss appeal.
Argentina, Joseph	Counsel	03/08/23	1.1	\$745.00	\$819.50	Sanctions: review and implement edits to motion to dismiss by M. Taticchi (.3); email to FDBR team regarding various motion issues (.2); analyze rules on filing supporting briefs, proposed orders, service, motion format, exhibits, disclosures (.6).
Argentina, Joseph	Counsel	03/09/23	3.0	\$745.00	\$2,235.00	Sanctions Appeal: revise motion to dismiss appeal for lack of prosecution (.8); email correspondence with FDBR team regarding various issues (.5); email correspondence with counsel to McGuckin re: consent (.2); review letter filing from McGuckin requesting consolidation and briefing schedule (.2); revise declaration in support of motion to dismiss appeal (.3); prepare exhibits to declaration (.3); finalize, file, and serve motion and related documents (.7).
Imani, Roya	Associate	03/09/23	2.0	\$685.00	\$1,370.00	Review and markup motion to dismiss appeals; incorporate internal team's edits to the motion to dismiss appeals; review declaration for the motion to dismiss appeals; draft Motion to Dismiss Appeal of Sanctions Order; confer and emails with J. Argentina regarding the motion to dismiss appeals.
Coe, Richard E.	Partner	03/09/23	0.4	\$865.00	\$346.00	Review and revise motion to dismiss appeal and exchange emails re: same.
Argentina, Joseph	Counsel	03/10/23	0.7	\$745.00	\$521.50	Sanctions Appeal: analyze possible responses to letter filing from McGuckin requesting briefing schedule and assign follow-up analysis to R. Imani.
Argentina, Joseph	Counsel	03/10/23	0.6	\$745.00	\$447.00	Sanctions appeal: legal research on standards for seeking extensions of deadlines to file appellate briefs.
Imani, Roya	Associate	03/10/23	1.5	\$685.00	\$1,027.50	Conduct legal research on local rules, the court clerk's procedures to figure out how appellants should have sought to consolidate the cases; email to J. Argentina, M. Taticchi, and C. Richard regarding same.

Coe, Richard E.	Partner	03/12/23	0.2	\$865.00	\$173.00	Review and revise response to letter requesting briefing schedule and consolidation and exchange emails re: same.
Argentina, Joseph	Counsel	03/12/23	2.6	\$745.00	\$1,937.00	Sanctions Appeal: review and revise analysis by R. Imani regarding motion to request extension of appellate briefs (.8); draft letter response to McGuckin's letter request to consolidate appeals (1.8).
Argentina, Joseph	Counsel	03/13/23	0.8	\$745.00	\$596.00	Sanctions appeal: finalize and file letter response to McGuckin letter requesting briefing schedule.
Coe, Richard E.	Partner	03/13/23	0.2	\$865.00	\$173.00	Review and revise letter re: consolidation of appeals.
Imani, Roya	Associate	03/17/23	2.3	\$685.00	\$1,575.50	Research local rules regarding failure to timely respond; emails with internal team; draft letter to District Court regarding Motion to Dismiss.
Coe, Richard E.	Partner	03/17/23	0.2	\$865.00	\$173.00	Review and revise letter re: dismissal of appeal.
Argentina, Joseph	Counsel	03/17/23	0.8	\$745.00	\$596.00	Sanctions Appeal: review and revise draft letter granting Motion to Dismiss as uncontested and related email correspondence with FDBR personnel.
Argentina, Joseph	Counsel	03/18/23	0.3	\$745.00	\$223.50	Sanctions appeal: review and revise letter requesting granting motion to dismiss as uncontested.
Coe, Richard E.	Partner	03/18/23	0.1	\$865.00	\$86.50	Review revised draft of letter re: appeal dismissal.
Coe, Richard E.	Partner	03/19/23	0.1	\$865.00	\$86.50	Review letter re: dismissal of appeal.
Argentina, Joseph	Counsel	03/20/23	0.2	\$745.00	\$149.00	Sanctions Appeal: finalize and file letter requesting dismissal as uncontested.
Argentina, Joseph	Counsel	03/22/23	0.1	\$745.00	\$74.50	Sanctions appeal: review order consolidating appeals and related email correspondence with R. Coe and M. Taticchi.
Coe, Richard E.	Partner	03/23/23	0.2	\$865.00	\$173.00	VAC Appeal: Review opposition to motion to dismiss for lack of prosecution and exchange emails re: same.
Argentina, Joseph	Counsel	03/24/23	1.1	\$745.00	\$819.50	Sanctions Appeal: review and analyze response to motion to dismiss and draft initial thoughts to FDBR group.
Argentina, Joseph	Associate	03/27/23	0.6	\$745.00	\$447.00	Sanctions appeal: review Judge Scott's order scheduling pretrial conference and form 26(f) files; procedures; and Federal Rules 26 and 16.
Imani, Roya	Associate	03/27/23	0.1	\$685.00	\$68.50	Emails with internal counsels regarding research assignment.
Argentina, Joseph	Counsel	03/28/23	0.7	\$745.00	\$521.50	Sanctions appeal: draft email to opposing counsel with recommended process to comply with order scheduling Rule 16 pretrial conference; manage case calendar.

Argentina, Joseph	Counsel	03/28/23	0.2	\$745.00	\$149.00	Sanctions appeal: Initial review of reply brief.
Argentina, Joseph	Counsel	03/29/23	2.4	\$745.00	\$1,788.00	Sanctions Appeal: revise reply brief in support of motion to dismiss.
Argentina, Joseph	Counsel	03/30/23	0.7	\$745.00	\$521.50	Sanctions Appeal: finalize, file, and serve Reply in support of MTD.
Argentina, Joseph	Counsel	04/02/23	1.1	\$745.00	\$819.50	Sanctions Appeal: review and revise draft form 26(f) document for submission to Judge Scott and related email correspondence with counsel to appellants
Argentina, Joseph	Counsel	04/03/23	0.8	\$745.00	\$596.00	Sanctions Appeal: attend Rule 16 conference (. 2); email correspondence with counsel to Appellants and Trustee regarding appeals (. 2); review and revise draft status reports (. 2); analyze magistrate judge issues (.2).
Argentina, Joseph	Counsel	04/12/23	0.3	\$745.00	\$223.50	Sanctions appeal: review order setting oral argument and analyze potential briefing drafting issues (.2); e-mail correspondence with M. Taticchi re: same (.1)
Taticchi, Mark D.	Partner	04/03/23	0.4	\$790.00	\$316.00	Review draft status-conference submissions (0.2); correspond with J. Argentina re: same (0.2)
Taticchi, Mark D.	Partner	04/10/23	2.5	\$790.00	\$1,975.00	Prepare for VAC appeal status conference (1.4); attend VAC appeal status conference (0.8); confer with J. Argentina re: same (0.3).
Taticchi, Mark D.	Partner	04/20/23	0.3	\$790.00	\$237.00	Correspond with J. Argentina re: standards governing motion to dismiss appeal.
Taticchi, Mark D.	Partner	05/04/23	3.1	\$790.00	\$2,449.00	Review briefing on motion to dismiss appeals (1.3); prepare oral argument outline (1.8)
Taticchi, Mark D.	Partner	05/08/23	3.4	\$790.00	\$2,686.00	Outline arguments for oral argument (0.8); prepare oral presentation for appellate argument (0.6); participate in oral argument (2.0).
Argentina, Joseph	Counsel	09/30/24	0.3	\$700.00	\$210.00	Sanctions Judgment: review memorandum opinion in support of denial of dismissal of Sanctions Appeal
Argentina, Joseph	Counsel	09/30/24	0.2	\$700.00	\$140.00	Sanctions Judgment: E-mail correspondence with Judge Scott's chambers re: scheduling order on sanctions appeal
Argentina, Joseph	Counsel	09/30/24	0.3	\$700.00	\$210.00	Sanctions Judgment: E-mail correspondences with R. Coe and M. Taticchi, client re: denial of dismissal of sanctions appeal
Argentina, Joseph	Counsel	09/30/24	0.3	\$700.00	\$210.00	Sanctions Judgment: review memorandum opinion in support of dismissal of Trustee appeal
Coe, Richard E.	Partner	09/30/24	0.3	\$815.00	\$244.50	Reveal appeal orders and exchange emails with J. Argentina and M. Taticchi re: same
Coe, Richard E.	Partner	10/01/24	0.2	\$815.00	\$163.00	Review revised drafts of memoranda and orders for bankruptcy appeal and exchange emails with M. Taticchi re: same
Taticchi, Mark D.	Partner	10/01/24	0.3	\$743.77	\$223.13	Analyze order denying Gardner motion to dismiss appeal (0.2); correspond with R. Coe and J. Argentina re: same (0.1).
Argentina, Joseph	Counsel	10/02/24	0.3	\$700.00	\$210.00	Sanctions Judgment: review Sanctions Appeal scheduling order and calendar key deadline:
Argentina, Joseph	Counsel	10/30/24	0.3	\$700.00	\$210.00	Sanctions Judgment: Initial review of McGuckin's appellant brief
Taticchi, Mark D.	Partner	10/30/24	0.7	\$743.76	\$520.63	Analyze McGuckin opening brief on appeal.
Coe, Richard E.	Partner	10/31/24	3.7	\$815.00	\$3,015.50	Review McGuckin appeal brief, sanctions opinion and motion to dismiss and outline points for appeal response brief
Argentina, Joseph	Counsel	10/31/24	0.2	\$700.00	\$140.00	Sanctions Judgment: coordinate delivery of Appellant's brief and exhibits to client
Argentina, Joseph	Counsel	10/31/24	1.4	\$700.00	\$980.00	Sanctions Judgment: review prior pleadings for briefing on issues raised by Appellant's brief
Argentina, Joseph	Counsel	10/31/24	0.8	\$700.00	\$560.00	Sanctions Judgment: review Appellant's brief
Hess, Ever M.	Associate	10/31/24	0.3	\$625.63	\$187.69	Call with M. Taticchi to discuss matter status and briefing strategy.
Taticchi, Mark D.	Partner	10/31/24	0.8	\$743.75	\$595.00	Confer with E. Hess re: matter background (0.3); review bankruptcy court's sanctions opinion (0.5).
Coe, Richard E.	Partner	11/01/24	0.5	\$815.00	\$407.50	Review bankruptcy court recusal opinion and draft points for response to appeal brief
Coe, Richard E.	Partner	11/01/24	0.6	\$815.00	\$489.00	Conference with J. Argentina and M. Taticchi re: response to appeal brief
Coe, Richard E.	Partner	11/01/24	0.2	\$815.00	\$163.00	Review prior research on advice of counsel defense and send email to J. Argentina re: same
Argentina, Joseph	Counsel	11/01/24	6.8	\$700.00	\$4,760.00	Sanctions Judgment: attention to appellee brief in Sanctions Appeal (review prior court orders, research applicable standards of review, begin draft brief).
Argentina, Joseph	Counsel	11/01/24	0.3	\$700.00	\$210.00	Sanctions Judgment: Confer with W. Gardner re: sanctions appeal briefing.
Argentina, Joseph	Counsel	11/01/24	0.5	\$700.00	\$350.00	Sanctions Judgment: Conference with R. Coe and M. Taticchi re: sanctions appeal briefing
Argentina, Joseph	Counsel	11/04/24	2.2	\$700.00	\$1,540.00	Sanctions Judgment: Research and drafting for Appellee brief.
Argentina, Joseph	Counsel	11/05/24	6.2	\$700.00	\$4,340.00	Sanctions Judgment: Continue draft of Appellee brief

Argentina, Joseph	Counsel	11/06/24	4.2	\$700.00	\$2,940.00	Sanctions Judgment: continue drafting background section for Appellee brief
Argentina, Joseph	Counsel	11/08/24	3.6	\$700.00	\$2,520.00	Sanctions Judgment: continue draft of background section for Appellee brief
Argentina, Joseph	Counsel	11/11/24	3.8	\$700.00	\$2,660.00	Sanctions Judgment: further analysis, research and drafting for appellee brief.
Coe, Richard E.	Partner	11/11/24	0.2	\$815.00	\$163.00	Exchange emails with J. Argentina re: question presented and evidentiary issues for appeal brief
Argentina, Joseph	Counsel	11/12/24	4.4	\$700.00	\$3,080.00	Sanctions Judgment: continue drafting appellee brief; coordinate record recovery and legal research projects.
Argentina, Joseph	Counsel	11/14/24	2.7	\$700.00	\$1,890.00	Sanctions Judgment: continue draft of appellee brief, review legal research results from E. Hess
Argentina, Joseph	Counsel	11/15/24	3.6	\$700.00	\$2,520.00	Sanctions Judgment: continue draft of Appellee brief
Argentina, Joseph	Counsel	11/17/24	2.3	\$700.00	\$1,610.00	Sanctions Judgment: continue draft of Appellee brief
Argentina, Joseph	Counsel	11/18/24	6.7	\$700.00	\$4,690.00	Sanctions Judgment: continue draft of Appellee brief in Sanctions Appeal
Coe, Richard E.	Partner	11/18/24	0.6	\$815.00	\$489.00	Review motion to strike Cohen affidavit and send email to J. Argentina re: proposed response to Cohen argument in appeal brief
Greer, Cathy M.	Paralegal	11/18/24	1.5	\$428.75	\$643.13	Retrieve certificate of appeal and exhibits for appellate case
Argentina, Joseph	Counsel	11/19/24	3.3	\$700.00	\$2,310.00	Sanctions Judgment: Finish first draft of Appellee brief in Sanctions Appeal
Argentina, Joseph	Counsel	11/21/24	0.4	\$700.00	\$280.00	Sanctions Judgment: E-mail correspondences with FDBR appellate team re: Appellee brief
Argentina, Joseph	Counsel	11/21/24	0.3	\$700.00	\$210.00	Sanctions Judgment: brief review of M. Taticchi's edits to Appellee brief
Argentina, Joseph	Counsel	11/22/24	2.1	\$700.00	\$1,470.00	Sanctions Judgment: Review and revise Appellee brief: incorporate edits and questions from M. Taticchi and R. Coe, additional revisions.
Coe, Richard E.	Partner	11/22/24	2.9	\$815.00	\$2,363.50	Review and revise appeal brief and exchange emails with J. Argentina and M. Taticchi re: same
Argentina, Joseph	Counsel	11/25/24	4.4	\$700.00	\$3,080.00	Sanctions Judgment: multiple rounds of revisions to Appellee brief; related legal and factual research; email correspondence with FDBR personnel.
Coe, Richard E.	Partner	11/25/24	1.8	\$815.00	\$1,467.00	Review client comments to brief, review and revise brief and exchange emails with J. Argentina and M. Taticchi re: same
Coe, Richard E.	Partner	11/26/24	0.5	\$815.00	\$407.50	Review and revise appeal brief and exchange emails with J. Argentina and M. Taticchi re: same
Argentina, Joseph	Counsel	11/26/24	0.5	\$700.00	\$350.00	Sanctions Judgment: revise Appellee brief.
Argentina, Joseph	Counsel	11/26/24	0.9	\$700.00	\$630.00	Sanctions Judgment: Final revisions to Appellee brief.
Hess, Ever M.	Associate	12/10/24	0.3	\$625.63	\$187.69	Review and analyze reply brief and correspond with M. Taticchi regarding same
Taticchi, Mark D.	Partner	12/10/24	1.1	\$743.75	\$818.13	Analyze McGuckin EDPA reply brief.
					\$186,374.40	Total Fees Incurred
					\$18,637.44	Less 10% discount
					<b>\$167,736.96</b>	<b>Total Fees Sought</b>



## **Exhibit 2**

Stay Motion Hearing Transcript

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ) 19-17117-AMC  
)  
)  
VASCULAR ACCESS CENTERS, LP, ) Philadelphia, PA  
) February 8, 2023  
Debtor. ) 12:30 p.m.

TRANSCRIPT OF TELEPHONIC MOTION HEARING  
BEFORE THE HONORABLE ASHELY M. CHAN  
UNITED STATES BANKRUPTCY JUDGE

APPEARANCES:

For the Chapter 11 Trustee: CHRISTOPHER M. HEMRICK, ESQUIRE  
100 Mulberry Street  
15th Floor  
Three Gateway Center  
Newark, NJ 07102

For Dr. McGuckin and Pennsylvania Vascular Institute: DAVID P. HEIM, ESQUIRE  
BOCHETTO & LENTZ, PC  
1524 Locust Street  
Philadelphia, PA 19102

For William Whitfield Gardner: JOSEPH N. ARGENTINA, JR., ESQUIRE  
FAEGRE, DRINKER, BIDDLE &  
REATH, LLP  
One Logan Square  
Suite 2000  
Philadelphia, PA 19103

Audio Operator: ESR

Transcribed by: DIANA DOMAN TRANSCRIBING  
P. O. Box 129  
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Proceedings recorded by electronic sound recording;  
transcript produced by transcription service.

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I N D E X

COLLOQUY:

PAGE

The Court and Mr. Heim regarding transfer of funds

3

THE COURT:

PAGE

Decision

4

Colloquy

3

1 (The following was heard via telephone conference  
2 at 12:30 p.m.)

3 THE COURT: Okay. The first matter is Vascular  
4 Access Center, motion to stay for approval of a bond for stay  
5 of judgment.

6 Could counsel make their appearance, please.

7 MR. HEIM: David Heim for Dr. McGuckin and  
8 Pennsylvania Vascular Institute.

9 MR. ARGENTINA: Joseph Argentina for William  
10 Whitfield Gardner.

11 MR. HEMRICK: Christopher Hemrick, Your Honor, on  
12 behalf of the Chapter 11 Trustee.

13 THE COURT: All right. Well, last time we were  
14 here, we were talking about a letter of credit that I believe  
15 Dr. McGuckin was going to post. I saw that there was some  
16 allegation I guess in your motion that on December 14th he  
17 transferred \$1.4 million in funds from an account at USB Bank  
18 to an account at PNC Bank for getting that letter of credit.  
19 So can you update me on that? Is there money still at the  
20 PNC Bank?

21 MR. HEIM: My understanding is, is that, yes, the  
22 PNC however, for whatever reason, really unexplained to us,  
23 cannot do the letter of credit. My suggestion would be that  
24 -- and I put this in the email to Mr. Argentina -- that Dr.  
25 -- that an escrow account get created controlled by Mr.

1 Gardner's law firm and the money get deposited in that, and  
2 if the appeal is successful, it goes to Dr. McGuckin. If it  
3 is not successful, it goes to Mr. Gardner. If it is  
4 partially successful, whatever reduction occurs, would get  
5 refunded to Dr. McGuckin and the remaining would go to Mr.  
6 Garner.

7 THE COURT: Okay. All right. Well, I just wanted  
8 to ask you that quick question before we get started. I did  
9 read all of the briefs and that was very helpful.

10 So when considering whether to grant the requested  
11 stay, the Court must consider the following four factors:

12 Number one, whether the stay applicant has made a  
13 strong showing that it is likely to succeed on the merits.

14 Two, whether the applicant would be irreparably  
15 injured absent a stay.

16 Three, whether issuance of a stay will  
17 substantially injure the other parties in the proceeding.

18 And, four, where the public interest lies.

19 The first two factors are the most important,  
20 whether the stay movant has demonstrated, one, a strong  
21 showing of the likelihood of success; and, two, that it will  
22 suffer irreparable harm, and the appellant must establish  
23 both. If the appellant does not make the requisite showings  
24 on either of the first two factors, the inquiry into the  
25 balance of harm and the public interest is unnecessary and

1 the stay should be denied without further analysis.

2 The Court agrees with Gardner that as a threshold  
3 matter, the motion should be denied because McGuckin has  
4 presented absolutely no evidence in support of any of the  
5 four factors. He filed no affidavit or declaration in  
6 support of either the motion or brief, and the Court will not  
7 rely on bald assertions made in the motion or brief.

8 With regard to the likelihood of success on the  
9 merits, the standard is to make out a strong showing of  
10 likely success. A party seeking a stay must do more than  
11 simply reiterate arguments with which the Court has already  
12 disagreed, the party seeking a stay must instead show  
13 something more than the same arguments the Court has already  
14 rejected.

15 For example, the appellant must show that the issue  
16 to be appealed is an issue of first impression in the  
17 circuit, or that district courts have disagreed on the issue,  
18 and the Court may consider the standard of review the  
19 appellate court will apply to the bankruptcy court's  
20 decision.

21 With one notable exception, his advice of counsel  
22 defense, McGuckin's brief merely repeats the same arguments  
23 this Court has already considered and rejected. For the  
24 first time in either the briefing on the sanctions motion or  
25 his recent motion, McGuckin argues that he is immune from

1 sanctions because he relied on experienced bankruptcy counsel  
2 who possess the material facts. However, McGuckin cannot  
3 raise the advice of counsel defense for the first time on  
4 appeal; the Court therefore will not consider such argument.

5 McGuckin's argument that he is likely to succeed  
6 because the Court erred in sanctioning him for litigating  
7 issues that were never determined to be sanctionable, such as  
8 the appeal, merely repeats what he previously argued and  
9 ignores the relevant standard, which permits recovery not  
10 just of expenses incurred in opposing sanctionable conduct,  
11 but also of other fees and expenses Gardner would not have  
12 paid but for the misconduct.

13 McGuckin's arguments that the amount of Gardner's  
14 fees was excessive also was previously raised and considered  
15 by this Court and will not be reconsidered at this time.

16 With regard to irreparable harm, to establish  
17 irreparable harm a stay movant must demonstrate an injury  
18 that is neither remote nor speculative, but actual and  
19 imminent. The possibility that adequate compensatory or  
20 other corrective relief will be available at a later date in  
21 the ordinary course of litigation weighs heavily against the  
22 claim of irreparable harm.

23 Here McGuckin did not provide any evidence of  
24 irreparable harm; no affidavit filed in support of his  
25 motion. In fact, he claims to already have personally

1 transferred \$1.4 million to that PNC Bank account. So there  
2 can be no irreparable harm to either PVI or McGuckin.

3 Moreover, there is no basis in law for his argument  
4 that the inability to operate can constitute irreparable  
5 harm. Although he cites an unreported one-page Third Circuit  
6 opinion for such proposition, South Camden, there was no  
7 analysis in that case, and the one case that South Camden  
8 relied upon, Hoxworth, does not stand for such proposition.

9 I looked closely at Hoxworth and the case does not  
10 say that the dissolution of a defendant's business is an  
11 exception to the black letter law that economic injury alone  
12 cannot constitute irreparable injury.

13 Hoxworth occurred in a completely different  
14 context. In that case, a preliminary injunction was sought  
15 prejudgment by a plaintiff in order to avoid the dissipation  
16 of a defendant's assets, because in such event any judgment  
17 obtained by plaintiff would no longer be recoverable. The  
18 court ultimately held that the unsatisfiability of a money  
19 judgment can constitute irreparable injury in the context of  
20 imposing a preliminary injunction prejudgment when it appears  
21 defendant is dissipating assets.

22 Here we have a completely different situation. A  
23 judgment already has been entered against McGuckin and  
24 McGuckin and PVI merely face an economic injury in terms of  
25 paying it. The fact that McGuckin has already transferred



1 \$1.4 million to cover such judgment amount demonstrates that  
2 there will be no impact on PVI, so there can be no argument  
3 that PVI will even suffer an economic injury.

4 Since the first two factors have not been  
5 satisfied, there is no reason for this Court to consider any  
6 other factors and the motion for a stay pending appeal will  
7 be denied. Thank you.

8 (Proceedings concluded at 12:37 p.m.)

9 \* \* \* \* \*

10 C E R T I F I C A T I O N

11 I, Roxanne Galanti, court approved transcriber,  
12 certify that the foregoing is a correct transcript from the  
13 official electronic sound recording of the proceedings in the  
14 above-entitled matter.

15  
16 /s/Roxanne Galanti

February 13, 2023

17 ROXANNE GALANTI

18 DIANA DOMAN TRANSCRIBING, LLC  
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